

**In The Matter Of:**

*Stacy L. Randall v  
Reed C. Widen, et al.*

**DUPLICATE ORIGINAL**

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*Steven Randall*

*Vol. II*  
*November 6, 2023*

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<p style="text-align: right;">Page 124</p> <p>1 IN THE UNITED STATES DISTRICT COURT 2 FOR THE WESTERN DISTRICT OF WISCONSIN 3 STACY L. RANDALL, CIVIL ACTION NO. 22-CV-400 4 Plaintiff, 5 -vs- 6 REED C. WIDEN, MICHAEL KIESLER, 7 WIDEN ENTERPRISES, LLC, and 7 WINDY WATERS, INC., 8 Defendants. 9 ----- 10 DEPOSITION OF: STEVEN RANDALL, VOLUME II 11 DATE: November 6, 2023 12 TIME: 9:58 a.m. to 1:24 p.m. 13 LOCATION: N4559 Trillium Court Portage, Wisconsin 53901 14 15 REPORTED BY: Janet D. Larsen, RPR 16 17 18 19 20 21 22 23 24 25</p>	<p style="text-align: right;">Page 126</p> <p>1 I N D E X 2 EXAMINATION BY: Ms. Wittenberg PAGE 127 3 4 EXHIBITS: MARKED <u>Exhibit 12</u> - June 10, 2016, emails between Michael Kiesler and Steve Randall with attached financial statements Bates WINDY0056318-56335 137 5 Exhibit 13 - Mortgage Assistance Application Bates WINDY0009301-9303 192 6 Exhibit 14 - Mortgage Assistance Application Bates WINDY0009298-9300 192 7 Exhibit 15 - Shareholder Agreement of Widen. Colourgraphics, Ltd., March 1, 1992 Bates WINDY0033106-33130 213 8 Exhibit 16 - Form 2553, Election by a Small Business Corporation, 1998 Bates WINDY0002068-2073 228 9 Exhibit 17 - Second Amendment to Shareholder Agreement, May 7, 2007 Bates WINDY001341-1347 230 10 Exhibit 18 - Third Amendment to Shareholder Agreement, January 8, 2013 Bates WINDY0001336-1340 232 11 Exhibit 19 - Land Contract between Pleasant Spring Enterprises L.L.C. and Steven T. Randall &amp; Stacy L. Randall Bates WINDY0008439-8444 248 12 13 14 15 16 17 18 MATERIAL REQUESTED: PAGE None 19 20 QUESTIONS FOLLOWED BY INSTRUCTIONS NOT TO ANSWER: None 21 22 (Original transcript supplied to Attorney Christa D. Wittenberg) (Originals of <u>Exhibit 12</u> through <u>19</u> are attached to the original transcript. Scanned copies were provided to all counsel) 23 24 25</p>
<p style="text-align: right;">Page 125</p> <p>1 A P P E A R A N C E S 2 3 REINHART BOERNER VAN DUEREN, S.C., by SAMUEL SYLVAN, ATTORNEY AT LAW 4 MARY MARGARET EVANS, ATTORNEY AT LAW 1000 North Water Street, Suite 1700 5 Milwaukee, Wisconsin 53202 ssylvan@reinhartlaw.com 6 mevans@reinhartlaw.com appeared on behalf of the Plaintiff. 7 7 O'NEIL, CANNON, HOLLMAN, DEJONG &amp; 8 LAING, S.C., by CHRISTA D. WITTENBERG, ATTORNEY AT LAW 9 KYLE T. KASPER, ATTORNEY AT LAW 111 East Wisconsin Avenue, Suite 1400 10 Milwaukee, Wisconsin 53202 christa.wittenberg@wilaw.com 11 kyle.kasper@wilaw.com appeared on behalf of the Defendants. 12 12 BOARDMAN &amp; CLARK, LLP, by AUSTIN DOAN, ATTORNEY AT LAW 13 1 South Pinckney Street, Suite 410 P.O. Box 927 14 Madison, Wisconsin 53701-0927 adoan@boardmanclark.com 15 appeared on behalf of the Witness. 16 17 18 19 20 21 22 23 24 25</p>	<p style="text-align: right;">Page 127</p> <p>1 TRANSCRIPT OF PROCEEDINGS 2 STEVEN RANDALL, having been first duly 3 sworn, was examined and testified as follows: 4 E X A M I N A T I O N 5 BY MS. WITTENBERG: 6 Q. Good morning, Steven. 7 A. Good morning. 8 Q. Thanks for having us back here today. So we're 9 here for part two of your deposition, and just to 10 remind you, we talked about some basic procedures 11 and ground rules for today. The same would apply, 12 so if you need a break at any time, let us know, 13 and I'll be happy to break for you. Okay? 14 A. Okay. 15 Q. Do you have a lawyer today for this deposition for 16 you in the room, Austin Doan? 17 A. Yeah. 18 Q. And, again, no attorney at Reinhart is your lawyer 19 today; right? 20 A. No. 21 Q. No, they're not your lawyer? 22 A. No, they're not my lawyer. 23 Q. Okay. All right. Have you had any discussions 24 with anyone since we were together last time on 25 October 12th about your deposition or your</p>

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<p>1 testimony in this case?</p> <p>2 MR. DOAN: I'm going to caution the</p> <p>3 witness not to reveal any attorney-client</p> <p>4 communication, so any other conversations you had</p> <p>5 other than with your attorneys.</p> <p>6 A. Okay. I talked with him a couple times but --</p> <p>7 Q. Okay. You talked with Austin a couple of times.</p> <p>8 Have you talked with any other lawyers --</p> <p>9 A. No.</p> <p>10 Q. -- since October 12th?</p> <p>11 A. No.</p> <p>12 MR. DOAN: I'll state for the record that</p> <p>13 there is a common interest agreement between, I</p> <p>14 forgot Stacy's last name, I apologize, is it</p> <p>15 Ms. Randall?</p> <p>16 MR. SYLVAN: Ms. Randall.</p> <p>17 MR. DOAN: Yeah, Ms. Randall and Mr.</p> <p>18 Randall.</p> <p>19 Q. Okay. Do you have an understanding of what a</p> <p>20 common interest agreement is, Mr. Randall?</p> <p>21 A. No.</p> <p>22 MR. DOAN: I'm just going to</p> <p>23 object to the extent it calls for a legal</p> <p>24 conclusion.</p> <p>25 MR. SYLVAN: Same objection.</p>	<p>1 MR. DOAN: No, go ahead and answer but</p> <p>2 don't, don't reveal the substance of the</p> <p>3 conversation.</p> <p>4 THE WITNESS: Okay.</p> <p>5 MR. DOAN: If you need it read back, the</p> <p>6 court reporter can read it back to you.</p> <p>7 A. Yes.</p> <p>8 Q. You had conversations with one or more lawyers at</p> <p>9 Reinhart?</p> <p>10 A. Yes.</p> <p>11 Q. Yes?</p> <p>12 Do you recall the name of that lawyer?</p> <p>13 MR. DOAN: I'm going to just, same</p> <p>14 objection.</p> <p>15 MR. SYLVAN: Same objection.</p> <p>16 A. No.</p> <p>17 Q. Is it one of the lawyers in the room today?</p> <p>18 A. Yes.</p> <p>19 Q. Is it the gentleman sitting to my right? Did you</p> <p>20 meet with Mr. Sylvan?</p> <p>21 A. No, I didn't meet with him, we just did a phone,</p> <p>22 talked on the phone.</p> <p>23 MR. SYLVAN: I'm going to object to this</p> <p>24 line of questioning to the extent it requires the</p> <p>25 witness to disclose privileged communications and</p>
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<p>1 Q. Fair.</p> <p>2 Did you sign a document that was</p> <p>3 unrelated to your interests being aligned with</p> <p>4 Stacy in this case?</p> <p>5 MR. DOAN: I'm going to have the same</p> <p>6 objection.</p> <p>7 MR. SYLVAN: Same here.</p> <p>8 MR. DOAN: Go ahead and answer if you</p> <p>9 understand the question.</p> <p>10 A. I haven't signed anything.</p> <p>11 Q. Okay. Did you have any discussion with any</p> <p>12 lawyers at Reinhart since October 12th when you</p> <p>13 were here last time?</p> <p>14 MR. SYLVAN: I'm going to object to the</p> <p>15 extent that you'd be disclosing common interest</p> <p>16 privileged communications.</p> <p>17 MR. DOAN: I'll join that as well.</p> <p>18 Q. I don't want to know what the content of the</p> <p>19 conversation was at this point, I just want to</p> <p>20 know if you've spoken with any lawyers at Reinhart</p> <p>21 since the first part of your deposition.</p> <p>22 MR. SYLVAN: The same objection.</p> <p>23 MR. DOAN: Join.</p> <p>24 THE WITNESS: So that means I don't have</p> <p>25 to answer?</p>	<p>1 information.</p> <p>2 MR. DOAN: Same objection.</p> <p>3 MS. WITTENBERG: Understood. So if I</p> <p>4 were to ask the contents of any conversation</p> <p>5 between Steve and you, Mr. Sylvan, you would, you</p> <p>6 would say that it's privileged, and you would</p> <p>7 instruct him not to answer; is that right?</p> <p>8 MR. SYLVAN: Correct.</p> <p>9 Q. Mr. Randall, will you follow those instructions?</p> <p>10 A. Yes.</p> <p>11 Q. Okay. Last time we were together we talked about</p> <p>12 you being called Grandpa Bling by your grandkids.</p> <p>13 Did Stacy have a nickname that was a play on</p> <p>14 grandma as well?</p> <p>15 A. I think they called her Grandma.</p> <p>16 Q. Grandma. Why did she get that nickname?</p> <p>17 A. She wanted to take that nickname.</p> <p>18 Q. Okay. Also last time we were here we had some</p> <p>19 discussions about the, the value or the success of</p> <p>20 Windy Waters or Widen Enterprises, and so I'm</p> <p>21 going to ask you a few questions to follow up on</p> <p>22 that line of questioning from last time. I</p> <p>23 understood your testimony to be that from, from</p> <p>24 your perspective, it appeared that Widen</p> <p>25 Enterprises or Windy Waters was doing quite well.</p>

<p style="text-align: right;">Page 132</p> <p>1 Do you recall that testimony?      2 A. Yes.      3 Q. And is there anything that you could tell me that      4 would explain what gave you that impression?      5 MR. SYLVAN: Objection. Asked and      6 answered in the previous session.      7 A. Just conversation.      8 Q. Conversation with who?      9 A. Reed.      10 Q. Do you recall anything specific that Reed said      11 about how Windy Waters or Widen Enterprises was      12 doing at any time?      13 A. Specific, no.      14 Q. Do you know, was this something you would talk      15 with Reed frequently or only on certain      16 occasions?      17 MR. DOAN: Object to form.      18 Go ahead and answer.      19 A. He would bring it up sometimes.      20 Q. He would bring it up, it wasn't you asking?      21 A. No.      22 Q. It was -- Okay.      23 Did it seem, were there specific numbers      24 offered by Reed when he would discuss how the      25 companies were doing?</p>	<p style="text-align: right;">Page 134</p> <p>1 A. Yes.      2 Q. Is Widen Enterprises' office or was it in 2020 in      3 the same place where you worked when you worked at      4 Widen Enterprises?      5 A. Yes.      6 Q. Had the office undergone renovations or remodeling      7 since you worked there?      8 MR. SYLVAN: Objection. Calls for      9 speculation.      10 MR. DOAN: Same. Join.      11 A. It was a brand-new building.      12 Q. It's a brand-new building now or --      13 A. It was a brand-new building when I worked there.      14 Q. Okay. And as far as you know, the offices      15 remained in that location through 2020?      16 MR. SYLVAN: I'll object to form.      17 A. I don't know.      18 Q. Did you ever go to the offices after you stopped      19 working there?      20 A. Yeah.      21 Q. Do you recall ever being in a different location?      22 A. Yeah. I used to be across the street.      23 Q. Maybe I should clarify.      24 After you stopped working there, do you      25 recall the office ever being in a different</p>
<p style="text-align: right;">Page 133</p> <p>1 MR. DOAN: Object to form.      2 MR. SYLVAN: Same objection.      3 A. I don't remember.      4 Q. Do you have any recollection of any specific      5 numbers that would indicate how Windy Waters or      6 Widen Enterprises was doing financially in 2020?      7 MR. DOAN: Object to form.      8 MR. SYLVAN: I'll join that objection.      9 A. I, I don't remember, 2020, I mean we're talking      10 three years back.      11 Q. When you worked at Widen Enterprises prior to      12 1999, do you recall how many employees the company      13 had?      14 A. Maybe a hundred to 150. It would bounce around      15 quite a bit.      16 Q. Were you aware generally about how many employees      17 the company had by about 2020?      18 A. No.      19 Q. Did you understand there to be more employees in      20 2020 than there were when you worked there?      21 MR. DOAN: I'm just going to object to      22 form.      23 A. No.      24 Q. Was, are you familiar with the Widen Enterprises      25 office?</p>	<p style="text-align: right;">Page 135</p> <p>1 location --      2 A. No.      3 Q. -- from the place where you worked? Okay.      4 Did you ever ask for and receive bank      5 records for Widen Enterprises or Windy Waters?      6 MR. DOAN: Object to form.      7 MR. SYLVAN: I'll join.      8 A. I would ask for stuff for doing our taxes.      9 Q. Do you ever recall that information you requested      10 including bank records?      11 A. No.      12 Q. And a brief follow-up on some of the inheritance      13 discussions we had last time as well. We talked      14 about the gold and silver coins and bars that      15 Stacy Randall had received from her parents.      16 Do you, do you understand why those were      17 sentimental to her or not?      18 MR. DOAN: Object to form.      19 MR. SYLVAN: I'll join.      20 A. I would say the coin collection that I got from my      21 dad, I would not want to sell that, because it's      22 something that he handled, and I'm assuming that      23 Stacy was probably the same way with, I mean never      24 in our marriage did we talk about selling any of      25 it.</p>

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<p>1 Q. Do you have, are there any other items you 2 believed that Stacy believed were sentimental? 3 MR. SYLVAN: I'll object to form. 4 MR. DOAN: The same objection. 5 A. I don't know. 6 Q. When your son passed away in, I believe it was 7 2015, was there a life insurance policy that was 8 in the name of either you or Stacy? 9 A. Yes. 10 MR. DOAN: Objection. Compound. 11 Q. Okay. And do you know specifically whether it was 12 in your name or Stacy's or both? 13 MR. DOAN: Same objection. 14 A. Don't remember. 15 Q. Do you recall the face amount of that life 16 insurance policy? 17 A. No. 18 Q. Do you recall what you or Stacy did with the life 19 insurance proceeds? 20 MR. DOAN: Objection. Compound. 21 A. No. 22 Q. Was it shared between the two of you? 23 A. I mean it's family money. That's all I, so -- 24 Q. And we talk about it being family money, meaning 25 it was for common use for the whole family?</p>	<p>1 MR. DOAN: I'll join that. 2 Q. All right. If you're having a hard time reading, 3 I can read it out loud to you, too, and if you 4 think it looks other than that, let me know. I'll 5 focus on the first page for now. It's an email 6 that says dated June 10th of 2016. I don't know 7 if you see that date line towards the top. 8 A. Yes. 9 Q. Okay. And go towards the bottom. The original 10 email on, not the actual original, I guess, 11 but there's one on June 10th as well, 2016, at 12 1:11 p.m. from you to Mike Kiesler with the 13 subject of Profit and loss. 14 Do you see that? 15 A. Yes. 16 Q. All right. And the text of the email reads, 17 Michael, I need profit and loss for Millmont and 18 Windy Waters for 3 months, Feb, March, April, for 19 the bank. Please respond! ASAP! Thank you, 20 Steve Randall. 21 Do you see that there? 22 A. Yes. 23 Q. Do you have any recollection looking at this as to 24 why you needed profit and loss information for 25 Millmont and Windy Waters?</p>
<p>1 MR. SYLVAN: Objection. Form. 2 MR. DOAN: Join. 3 A. Just went in to be, went into the checking 4 account. I don't know. 5 Q. And previously you explained that if you needed 6 information about Widen Enterprises or Windy 7 Waters, you would ask typically Mike Kiesler. 8 Does that sound correct to you? 9 MR. DOAN: Object to form. 10 A. Yes. 11 (<u>Exhibit 12</u> marked for identification) 12 Q. Mr. Randall, you've been handed what's been marked 13 as <u>Exhibit 12</u>, and I'll ask if you recognize this 14 to be an email exchange between Mike Kiesler and 15 you. 16 MR. SYLVAN: I'll object to the extent 17 that it misrepresents what the document is. 18 MR. DOAN: Join. Go through it. 19 A. I, I can't see that anyway since it's so small. 20 MS. WITTENBERG: Okay. Will the two of 21 you agree for the record this is an email from 22 Mike Kiesler to Mr. Randall and Stacy Randall? 23 MR. SYLVAN: The top email, that, that is 24 correct. 25 MS. WITTENBERG: Okay.</p>	<p>1 A. It said for the bank. 2 Q. Do you have any recollection of why the bank may 3 have needed that -- 4 A. No. 5 Q. -- information? Okay. 6 MR. DOAN: Just try to let her finish the 7 question -- 8 THE WITNESS: Pardon me? 9 MR. DOAN: Let her finish the question 10 before you answer. 11 Q. And attached to the exhibit, I'll represent to 12 you, are the documents that go with this email. 13 Take a moment to look, page through if you need 14 to. And my question will be if you would agree 15 that it includes the financials for Widen 16 Enterprises. 17 MR. SYLVAN: Object to form. 18 MR. DOAN: I'll join. 19 A. It they're too small, I can't read it. Could you 20 grab on my desk a magnifying glass. 21 (Discussion off the record) 22 MS. WITTENBERG: We can go back on. 23 Q. I do apologize for the small print, so when you're 24 able to, my question will be if you would agree 25 that what's attached to this document includes</p>

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<p>1 financial statements for Widen Enterprises from 2 2016.</p> <p>3 MR. SYLVAN: Objection. Form.</p> <p>4 MR. DOAN: Join.</p> <p>5 A. A lot of numbers. April 2015 to April 2016. So 6 this is a year's worth here; is that what this is?</p> <p>7 Q. Well --</p> <p>8 A. Must be.</p> <p>9 Q. -- I understand this to be financial dated 10 April 30, 2016. I'm looking at the second page of 11 the document. That's, that's what I see it should 12 be. I'm asking if that's what you understand them 13 to be as well.</p> <p>14 A. I'm sorry, what?</p> <p>15 Q. I'm asking if that's what you understand them to 16 be as well, which is financial statements of Widen 17 Enterprises dated April 30th, 2016.</p> <p>18 A. It appears to be.</p> <p>19 Q. And stevenrandall@yahoo.com is your email address 20 and was at the time; right?</p> <p>21 A. Yes it is, still is today.</p> <p>22 Q. Glammyisme@gmail.com, is that an email that Stacy 23 Randall used?</p> <p>24 A. That sounds like one of them she used, yeah.</p> <p>25 Q. Did you ever withhold information from Stacy</p>	<p>1 for income and profit information of Windy Waters 2 or Widen Enterprises and was told no, that you 3 could not have that information. I want to 4 revisit that conversation.</p> <p>5 I, I believe you testified that was while 6 you were employed at Widen Enterprises.</p> <p>7 MR. SYLVAN: Object to the --</p> <p>8 Q. Is that your understanding?</p> <p>9 MR. SYLVAN: Objection to the extent it 10 mischaracterizes his prior testimony.</p> <p>11 MR. DOAN: I'll join.</p> <p>12 A. What's your question?</p> <p>13 Q. I'm happy -- I certainly don't want to 14 misrepresent anything. I'm just trying to 15 understand what you were saying before. I believe 16 you said that you had asked for income and profit 17 information about either Windy Waters or Widen 18 Enterprises and that Mike Kiesler refused to 19 provide that information to you. Is that what 20 your testimony is?</p> <p>21 MR. SYLVAN: Same objection.</p> <p>22 MR. DOAN: Join.</p> <p>23 A. I -- hmm. There was never a time where I or 24 Stacy could just sit down and talk to someone at 25 Widen about how good the company is doing or is</p>
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<p>1 Randall about Windy Waters or Widen Enterprises?</p> <p>2 MR. DOAN: Object to form.</p> <p>3 MR. SYLVAN: I'll object to the extent it 4 calls for disclosing marital privileged 5 communications.</p> <p>6 MR. DOAN: I'll join.</p> <p>7 THE WITNESS: So do I answer or not?</p> <p>8 MR. DOAN: Go ahead and answer but don't 9 reveal any communications --</p> <p>10 THE WITNESS: Okay.</p> <p>11 MR. DOAN: -- between you and Stacy.</p> <p>12 A. No.</p> <p>13 Q. And no meaning no you never did withhold 14 information from her?</p> <p>15 A. Right.</p> <p>16 Q. And would you agree any time you received 17 information about the company, meaning Widen 18 Enterprises or Windy Waters, you would share it 19 with her?</p> <p>20 MR. SYLVAN: Objection to the extent it 21 mischaracterizes his testimony.</p> <p>22 MR. DOAN: Join.</p> <p>23 A. It would be available to her, yes.</p> <p>24 Q. When we were together last, you testified that 25 there were, there were occasions that you asked</p>	<p>1 not doing. That just never happened. If I needed 2 stuff for doing taxes or for the bank, evidently 3 they would, they would give it to me. I know I 4 would always get enough to do the taxes. I don't 5 remember this with the bank stuff, but it's right 6 here in an email so --</p> <p>7 Q. Did you ever ask to sit down and have a 8 conversation with, we'll start with Mike Kiesler, 9 about how the company was doing?</p> <p>10 A. I probably would have talked to Reed.</p> <p>11 Q. Do you have a memory of talking to Reed and asking 12 for this, to have a sit-down conversation about 13 how the company was doing?</p> <p>14 A. No. I do remember Stacy trying to find out at 15 times, though.</p> <p>16 Q. Okay. Tell me about that.</p> <p>17 A. Just that she would ask to see how the company is 18 doing.</p> <p>19 Q. Did you hear her ask this of anyone?</p> <p>20 A. Yeah.</p> <p>21 Q. Who was, who was she asking?</p> <p>22 A. I think Reed was on the other end of the phone.</p> <p>23 Q. So it was a phone call that you observed?</p> <p>24 A. Yes.</p> <p>25 Q. Are you thinking of one occasion or multiple?</p>

<p style="text-align: right;">Page 144</p> <p>1 A. I, I don't remember.      2 Q. Is there a, is there a phone call that you are      3 recalling as you're giving this testimony?      4 A. No.      5 Q. Okay. Do you have a memory of any occasion where      6 this occurred?      7 MR. SYLVAN: Objection. Form.      8 A. I would say that more than once over the years      9 that I heard her ask.      10 Q. Is there anything more specific than over the      11 years that you can say about the timing of when      12 you recall these conversations occurring?      13 A. No.      14 Q. Okay. Do you know whether it was before or after      15 2020?      16 A. No, I don't.      17 Q. Do you recall any specific questions that you      18 heard Stacy Randall ask about Widen Enterprises or      19 Windy Waters?      20 MR. SYLVAN: Objection. Form.      21 A. I don't remember.      22 Q. Do you recall more generally what, what you      23 understood her to be asking for when you heard her      24 on a phone call with someone --      25 MR. SYLVAN: Same objection.</p>	<p style="text-align: right;">Page 146</p> <p>1 A. That sounds pretty good.      2 Q. Okay. Did you hear the other end of the phone      3 call to know what the person said in response?      4 A. No, I don't know.      5 Q. So it wasn't on speaker phone or something?      6 A. No.      7 Q. It's just you heard Stacy's side only?      8 A. Right.      9 Q. Okay. And do you know, do you know from any      10 reason what, what that person responded when, if      11 and when she asked how the business was doing?      12 MR. SYLVAN: I'll object to the extent it      13 requires a disclosure of marital privileged      14 communications.      15 MR. DOAN: I'll join that objection.      16 A. I, I don't remember.      17 Q. Other than asking the question, how are the      18 businesses doing, is there any other question that      19 you heard Stacy ask someone about Windy Waters or      20 Widen Enterprises?      21 A. I'm sure there was, but I, like I said, that's a      22 long time ago, I don't really remember.      23 Q. There's nothing you can point to that would, that      24 would, no example you could give of any question      25 you heard her ask?</p>
<p style="text-align: right;">Page 145</p> <p>1 Q. -- about Windy Waters or Widen Enterprises?      2 A. I don't remember. And I would just assume she was      3 trying to find out how the company was doing.      4 Q. What's the basis for that assumption?      5 A. Well, it's her company, too. She should know      6 what's going on, and that didn't always happen.      7 Q. Okay. What did, what, if anything, did she say      8 that would give some impression to you that she      9 was asking for financial information about Windy      10 Waters or Widen Enterprises?      11 MR. SYLVAN: I'll object to the extent      12 it's calling for communications that are      13 privileged by the marital privilege.      14 MR. DOAN: I'll join.      15 Q. I want to know what she said to the person she was      16 talking to on the phone and not to you. So I'm      17 asking, what did you hear her say to somebody on a      18 phone call that made you think she was asking for      19 financial information of Windy Waters or Widen      20 Enterprises?      21 A. When she's asking about the business and how      22 they're doing, that leads me to believe that she's      23 asking to find out about the companies.      24 Q. So was the question, is how are the businesses      25 doing, that you heard her ask somebody?</p>	<p style="text-align: right;">Page 147</p> <p>1 A. No. Since 1999 my health has went down, and I      2 pretty much had to concentrate on getting my      3 health better, so everything's kind of a blur      4 since 1999 or 2000, whatever you want to say.      5 Q. Okay. Are you telling me that you don't have      6 memories between 1999 and the present day?      7 A. I have memories. It's just not --      8 MR. SYLVAN: Objection, objection to the      9 extent it mischaracterizes his testimony.      10 A. It's just as strong as I'd like it to be.      11 Q. And I can appreciate and understand that. I'm      12 just asking you to do your best of what you can      13 recall.      14 So I think my question was something like      15 are there any other questions that Stacy Randall      16 asked, and if you don't remember any, that's okay,      17 I just want to know is there anything else that      18 you can remember Stacy Randall asking about      19 Windy Waters or Widen Enterprises at any time on      20 the phone call you overheard.      21 A. I, I don't remember.      22 Q. Now, going back to you asking for profit and      23 income information about the companies and being      24 denied it. Do you remember that testimony from      25 last time?</p>

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<p>1           MR. SYLVAN: Objection to the extent it 2       mischaracterizes his prior testimony. 3   Q. Was there an occasion when you asked for a profit 4       and loss, or, I'm sorry, profit or income 5       information about Widen Enterprises and Windy 6       Waters that you can recall specifically? 7   A. I know it was always very tough for them to give 8       out information on the companies. 9           MS. WITTENBERG: Can you read my question 10      back, please, Janet. 11           (Question read) 12   A. I don't remember. 13   Q. So, so there's not a certain occasion you can 14       remember right now; right? 15   A. I don't remember. 16   Q. Do you recall whether, any occasion where you 17       asked for information and were denied it was in 18       writing? 19           MR. SYLVAN: Objection. Form. 20   A. I don't remember. 21   Q. We talked generally about stock transactions 22       between Stacy and Windy Waters, times that she 23       sold stock back to the company. Do you recall 24       that, generally talking about that last time? 25   A. Yeah.</p>	<p>1       Calls for speculation and form. 2           MR. DOAN: Join. 3   A. I was never comfortable with the amounts that she 4       would get, only because she didn't know how they 5       came up with them, the amount. 6   Q. And you're referring to occasions when she sold 7       her stock back to Windy Waters; correct? Yes? 8   A. When she would sell her stock, I wanted her to 9       find out how they came up with the price. 10   Q. Did you have any conversations on her behalf with 11       anyone at Windy Waters or Widen Enterprises -- 12   A. I did not. 13   Q. Let me -- If I have to finish just to keep the 14       record clear. 15           -- about how the price was calculated? 16           MR. DOAN: Object to form. 17           MR. SYLVAN: Join. 18   A. I, I don't remember exactly, but I, I really don't 19       remember. 20   Q. Do you have, I'll -- Outside of talking with Stacy 21       about the redemption, what, if anything, did you 22       learn about how much money she got from a stock 23       transaction on any occasion? 24           MR. SYLVAN: Objection. Form. 25           MR. DOAN: Same objection. Join.</p>
<p>Page 149</p> <p>1   Q. I'm going to go through some dates here, and I'm 2       going to ask if you recall specifically those 3       transactions occurring. Okay. 4           Do you recall in June 2005 approximately 5       that Stacy redeemed some shares of Windy Waters 6       and received money? 7           MR. DOAN: Objection. Foundation. 8   A. I, I don't remember. 9   Q. Okay. Do you recall needing or receiving \$200,000 10      in 2005 -- 11           MR. DOAN: Same -- 12   Q. -- related to her shares? 13           MR. DOAN: Same objection. Also object 14      to form. 15           MR. SYLVAN: I'll join. 16   A. I really don't remember. 17   Q. Were you aware of any need for money in 2005 and 18       need for \$200,000? 19           MR. DOAN: Object to form. Vague. 20           MR. SYLVAN: Join. 21   A. I don't remember. 22   Q. Do you recall any, any indication of how the 23       price, the amount of money Stacy got for her stock 24       was calculated at any time? 25           MR. SYLVAN: Objection. Foundation.</p>	<p>Page 151</p> <p>1   A. I, I don't know. 2   Q. What, if anything, did you understand about the 3       use of any formula to determine the amount of 4       money she would get when selling stock? 5           MR. SYLVAN: Objection. Foundation. 6       Calls for speculation and form. 7           MR. DOAN: Join. 8   A. It would have been nice if we would have known how 9       that was, yeah, there was some type of formula 10      that they used, how they based it on, and any 11      information on the value would have been nice. 12   Q. Did you ask for any information on the value? 13   A. I think in the earlier years, yes, I was asked. 14   Q. Who, who did you ask? 15   A. I didn't ask, I think Stacy did. 16   Q. Okay. You didn't ask for information on how her 17       stock would be valued? 18   A. No. 19   Q. Okay. And what leads you to think Stacy asked for 20       that information? 21           MR. SYLVAN: I'm going to object to the 22       extent that answering requires disclosing 23       communications that are protected by the marital 24       privilege. 25           MR. DOAN: I'll join.</p>

<p style="text-align: right;">Page 152</p> <p>1 A. Okay.      2 MR. DOAN: Try to answer.      3 Q. Answer if you can.      4 MR. DOAN: Try to answer, Steve, but do      5 not disclose any communications --      6 A. I probably would have heard her trying to ask and      7 whether a phone conversation or right to Reed or      8 Mike Kiesler.      9 Q. Okay. You say you probably would have. Do you      10 recall an occasion when she asked how her stock      11 was valued that you overheard?      12 A. I remember conversations over the years. Do I      13 recall them exactly, no.      14 Q. All right. What do you recall from those      15 conversations?      16 A. That she questioned how they came up with the      17 amount.      18 Q. These are phone calls you overheard?      19 A. Could have been a phone call, could have been      20 right in person, right next to her. I don't      21 know.      22 Q. Okay. We'll start with the phone calls then.      23 Are there any phone calls that come to mind that      24 you're imagining recalling in your head where she      25 asked how the price was calculated?</p>	<p style="text-align: right;">Page 154</p> <p>1 yeah, I know she would have asked or had asked.      2 Q. Okay.      3 A. When and how, I don't remember the exact specifics      4 of it, of it all, but I know, I know it was      5 something that was asked.      6 Q. Okay. And so I'm trying to find out specifically      7 times that you can recall this happening. Are      8 there any, is there anything you can say that it      9 would have happened, you think it happened, what      10 can you tell me about these conversations?      11 MR. SYLVAN: Objection. Asked and      12 answered.      13 A. You know, I can remember things being done and      14 said, but to know exactly what was done and said,      15 I mean it's hard for me to remember stuff that      16 happened last week, exactly what was said, but do      17 I know something was said, yes.      18 Q. Okay. And I'm trying to get at least as much as      19 you recall, and you're saying, your recollection      20 is that at some point over the years she had a      21 conversation with someone asking how her shares      22 would be valued.      23 A. Yes.      24 Q. Is that what you're saying?      25 A. Yes.</p>
<p style="text-align: right;">Page 153</p> <p>1 MR. DOAN: I'm just going to object to      2 form on imagining.      3 MR. SYLVAN: I'm going to object to the      4 extent answering --      5 A. Imagining?      6 MR. SYLVAN: If you just -- Sorry, I'm      7 going a little slow on my objections, but I'm      8 going to object to the extent answering that      9 question requires disclosing marital privileged      10 communications.      11 A. So I don't need to answer it?      12 Q. I'll try again.      13 There was a phone call, if I'm      14 understanding your testimony, there were times      15 where there were phone calls you overheard where      16 Stacy was talking on the phone to someone asking      17 how the shares that she owned in Windy Waters were      18 valued. Am I understanding that correctly?      19 MR. SYLVAN: Same objection and form.      20 A. I don't remember.      21 Q. There's not any phone call that you right now can      22 recall where she asked over a phone to someone how      23 the shares in Windy Waters were calculated?      24 A. I know in, over the years that she had tried to      25 get a finger on how they were doing all that, so,</p>	<p style="text-align: right;">Page 155</p> <p>1 Q. Is there anything beyond that that you recall,      2 other than the fact that it happened at some      3 point?      4 MR. SYLVAN: Objection. Asked and      5 answered, and form.      6 A. I don't, I don't know what, what are you looking      7 for, what -- I'm not sure. What are you asking?      8 Q. I want to know if there's anything else you recall      9 about these conversations other than the fact that      10 she asked something that would suggest she wanted      11 to know how her shares were calculated.      12 MR. SYLVAN: Same objection.      13 A. I remember conversations. I don't remember the      14 total specifics of them because it's been so      15 long.      16 Q. Do you recall who she was talking to on any      17 occasion where she asked about the value of her      18 shares?      19 A. I know Reed, and I know she probably talked to      20 Mike Kiesler, but I'm not sure.      21 Q. Do you recall any in-person conversations? We      22 were talking about phone calls a little bit.      23 Do you recall any in-person conversations      24 specifically where Stacy asked somebody about the      25 value of her shares in Windy Waters?</p>

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<p>1 A. I wasn't there when she asked, but, yes, she has 2 told me -- 3 MR. SYLVAN: I'm going to caution you -- 4 A. Stop. 5 MR. SYLVAN: -- to not disclose -- 6 A. I'm going to stop there. 7 MR. SYLVAN: -- communications you had in 8 private with Stacy during the marriage. 9 A. Okay. 10 Q. And were any of those conversations I think you 11 were alluding to, did Stacy ever tell you in the 12 presence of someone else that she had asked about 13 how the value of her shares would be calculated? 14 MR. SYLVAN: Same objection. Same 15 caution. 16 A. I don't remember. 17 Q. We've been going a little while here. Do you want 18 to take a little break? 19 A. No. Go ahead. 20 Q. Okay. Let me know any time you want to take a 21 break. Okay? 22 A. Soon. 23 Q. I started with a 2005 date. I'm going to march 24 through now. So 2007, do you have any 25 recollection of needing \$250,000 for the family in</p>	<p>1 MR. DOAN: Object to form. 2 MR. SYLVAN: And foundation. 3 A. I, I don't remember. 4 Q. And do you have any recollection of receiving 5 \$200,000 in 2011 from Stacy selling some shares? 6 MR. SYLVAN: Same -- 7 A. No. 8 MR. SYLVAN: Same objections. 9 A. I don't. 10 Q. Do you have any recollection of the family needing 11 \$78,000 in 2017? 12 MR. SYLVAN: Same objections. 13 MR. DOAN: Object to form. Join. 14 A. I don't recall. 15 Q. Do you have any recollection of receiving \$78,000 16 as a family in 2017 from Stacy selling her 17 shares? 18 A. I don't recall. 19 MR. SYLVAN: Same objections. 20 Q. Do you have any memories specifically of any times 21 that Stacy received money for shares? 22 MR. SYLVAN: Object to form and 23 foundation. 24 MR. DOAN: Same objection. 25 A. Yes, I remember when, I remember she would get, I,</p>
<p>1 2007? 2 MR. DOAN: I'm going to object to form. 3 Vague. 4 MR. SYLVAN: I'm also going to object, 5 foundation. 6 MR. DOAN: Try to, if you understand the 7 question, go ahead and answer, Steve. 8 A. Let's see, in 2007. That's when I started out 9 with the cancer. I think I had cancer, I had 10 surgery to remove a tumor on my kidney, so I mean 11 there was not -- I remember from that area. 12 Q. So I understand you to be saying you don't recall 13 a need for the family to get \$250,000 in 2007? 14 MR. SYLVAN: Objection to the extent it 15 mischaracterizes his testimony. 16 MR. DOAN: I'll join. 17 A. I, I don't, I don't know. 18 Q. You don't recall? 19 A. I don't recall. 20 Q. Do you have memory of the family receiving 21 \$250,000 in 2007 for Stacy selling some shares? 22 A. I don't recall. 23 Q. I'll fast forward a few years to 2011. Do you 24 have any memory of the family needing \$200,000 in 25 2011?</p>	<p>1 I, I guess I'm not sure what was -- When she was 2 getting paid, she would get money from the company 3 in the earlier days as a stockholder without 4 selling her stocks. 5 Q. Do I understand you to be saying that you just 6 aren't sure when you look back and think about 7 Stacy getting money because of her ownership, you 8 couldn't differentiate between whether she was 9 getting it for selling shares -- 10 A. Well -- 11 Q. -- versus other purposes? 12 MR. SYLVAN: I'll object to the extent it 13 mischaracterizes his testimony. 14 Q. Do you need the question read back? 15 A. Yeah, read the question back. 16 MS. WITTENBERG: Could you read it back, 17 Janet. 18 (Question read) 19 MR. SYLVAN: Same objection. 20 A. I would know because she would tell me what was 21 going on. 22 MR. SYLVAN: I'm going to caution you -- 23 A. And that's as far as I'm going. 24 MR. SYLVAN: -- not to disclose marital 25 communications.</p>

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<p>1 Q. And I guess my, my question is, you're saying you 2 don't recall any stock transactions, any, any time 3 that stock was sold for money?</p> <p>4 A. No, you're saying that, I'm not.</p> <p>5 Q. Okay. So you do recall times that she sold stock 6 for money?</p> <p>7 A. That's what I just said.</p> <p>8 Q. Okay. Do you recall on those occasions, any 9 occasions you can recall, what the money was 10 needed for?</p> <p>11 A. No.</p> <p>12 MR. SYLVAN: Objection to form.</p> <p>13 Q. Are there any occasions that you recall, do you 14 recall what the money was used for?</p> <p>15 A. No.</p> <p>16 Q. In 2019, if I recall from the discussion last 17 time, you and Stacy filed for divorce; is that 18 right?</p> <p>19 A. Yes.</p> <p>20 Q. Did you have a discussion around the time you 21 filed for divorce with her about another stock 22 redemption where she was selling some stock?</p> <p>23 MR. DOAN: I'm just going to caution the 24 deponent not to answer, not to disclose any 25 communications between you and Stacy in private</p>	<p>1 stick out as a marker in your mind, like a before 2 and after, you can kind of pinpoint if it was 3 before or after you filed for divorce?</p> <p>4 A. I think it, I remember it being like November or 5 December, somewhere in there, towards the end of 6 the year that we finalized it.</p> <p>7 Q. And to be clear, I wasn't actually asking --</p> <p>8 A. What year, I don't know.</p> <p>9 Q. Yeah, sorry. I wasn't asking what the date was; I 10 have that from records. I'm trying to know, I 11 was, I assume the date that you and Stacy filed 12 for divorce was, was a big date for you, a big 13 deal; right?</p> <p>14 A. No, I, I don't know what the date would be. 15 I guess I didn't look at it that way, but, no, I 16 don't know what the date would be for that.</p> <p>17 Q. Okay. And I'm going to ask you to try to the best 18 of your ability to only tell me conversations that 19 occurred after you filed for divorce, okay. So I 20 recognize that might be hard for you to do. So 21 after the two of you filed for divorce, did you 22 have any discussions with Stacy at any point about 23 redeeming, her redeeming shares in Windy Waters?</p> <p>24 MR. SYLVAN: I'm going to object to the 25 extent it requires disclosing marital</p>
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<p>1 during your marriage.</p> <p>2 MR. SYLVAN: Same objection.</p> <p>3 A. I can't answer it.</p> <p>4 Q. So I'm asking for conversations specifically after 5 the two of you filed for divorce, when you were 6 already separated, and I'm wondering if after that 7 time you had any discussions in 2019 about Stacy 8 selling her stock.</p> <p>9 MR. DOAN: I'm going to, I'm going to do 10 the same instruction to the witness to the extent 11 that I don't know when the divorce was, the final 12 judgment was entered for the divorce.</p> <p>13 MR. SYLVAN: I'm going to join that 14 objection.</p> <p>15 A. And I don't remember either so, when the exact 16 dates were.</p> <p>17 MS. WITTENBERG: Let's take a short 18 break. Maybe we can talk about privilege for a 19 second because I do have some thoughts on that. 20 Let's take five or ten.</p> <p>21 (Break taken)</p> <p>22 Q. All right. Before we took the break, I had asked 23 a question. I'm going to rephrase it here now. 24 Actually, I'll back up a little bit here.</p> <p>25 Does the date that you filed for divorce</p>	<p>1 communications while you were still living 2 together.</p> <p>3 A. It would, too, yeah.</p> <p>4 MR. SYLVAN: Just to be clear, I'm going 5 to instruct you not to answer if it requires 6 disclosing communications you had with Stacy while 7 you were living together.</p> <p>8 A. I'm trying to think when the mediation was, if we 9 were still living together. I don't think we 10 were, but I know when we went to mediation, we 11 talked about, we talked about her having to sell 12 all of her stock.</p> <p>13 MR. SYLVAN: I'm going to object to the 14 extent that conversation --</p> <p>15 THE WITNESS: Yeah.</p> <p>16 MR. SYLVAN: -- occurred in private with 17 Stacy while you were living together.</p> <p>18 A. It was, okay. I can't answer that then.</p> <p>19 Q. Are you talking about a mediation that occurred 20 during the course --</p> <p>21 A. Yes.</p> <p>22 Q. -- of divorce proceedings?</p> <p>23 A. Yes.</p> <p>24 Q. And you're saying you don't recall as you sit here 25 if you lived together or not at that point; right?</p>

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<p>1 A. I'm not sure when she ended up going, moving 2 out. 3 MS. WITTENBERG: Okay. I don't want to 4 revisit the old testimony before that. I 5 believe -- Do you want me to go ahead and get that 6 document back out and show him the petition? 7 MR. SYLVAN: Yes. I'm not quite sure 8 where you're going, but -- 9 MS. WITTENBERG: Okay. I only have one 10 copy because it's, I didn't plan ahead for this 11 one. 12 MR. DOAN: You can just tell me the 13 exhibit, Christa. 14 MS. WITTENBERG: Sure, Exhibit 1 for 15 his. 16 Q. I'm sorry. It's got a couple markings on it, but 17 this is Exhibit 1 that I'm handing you from your 18 deposition from the last time we were together. 19 And I believe on the first page, it lists 20 addresses -- 21 A. Okay. 22 Q. -- for you and Ms. Randall. Do you see that? 23 A. Yeah. 24 Q. They're different addresses; right? 25 A. Right.</p>	<p>1 A. Yes. 2 Q. And if you were trying to verify when she obtained 3 that property, you would look at when the lease 4 started? 5 A. I, yeah, that would tell you when she, yeah. 6 MR. DOAN: I don't know if it's cleaner 7 to have a discussion on the record about maybe if 8 you want to ask questions after April 1st, 2019. 9 MS. WITTENBERG: Yes, that is my intent, 10 only after that date. 11 MR. SYLVAN: I just want to make clear 12 the, the document uses the word resides, so I just 13 want to be sure, make clear that that is not 14 necessarily the same thing as cohabitation, so I 15 just want to put that on the record. 16 MS. WITTENBERG: Okay. And so, again, 17 your client's position is that they were still 18 living together as of April 1st, 2019? 19 MR. SYLVAN: That is not our position. 20 Our position is what I just stated. 21 MS. WITTENBERG: Okay. All right. 22 Q. So then going back to the line of questioning we 23 were talking about before now that your 24 recollection was refreshed, do you recall 25 discussions during mediation during the divorce</p>
<p>1 Q. And can you turn to the back page and find some 2 signatures and a date, I believe, on the back 3 page. I think there's one more there. 4 A. Okay. This is April of 2019. 5 Q. Does this refresh your recollection that you were 6 living in different locations at least as of 7 April 1st of 2019? 8 A. Yes. 9 MR. SYLVAN: I'm going to -- 10 A. It appears that way. 11 MR. SYLVAN: I'm going to object to the 12 extent it mischaracterizes what the testimony 13 shows. 14 Q. Okay. So I'll, I'm just asking does this refresh 15 your memory, so would you agree that before, by 16 April 1st, 2019, you and Stacy no longer lived 17 together; is that right? 18 A. That would appear from this document. 19 Q. Do you have any reason to believe that document 20 would have been inaccurate in any way? 21 A. I'm not sure when she took the lease, whether she 22 was already in it already at this point. 23 Q. When you say when she took the lease, do you mean 24 there, the property she moved into was a rental 25 property?</p>	<p>1 proceedings after it had been filed where you 2 talked about Stacy redeeming shares? 3 MR. DOAN: I'm going to object to be 4 form. I don't know if you're asking him the whole 5 divorce proceedings or just mediation. 6 Q. Sure. Okay. So any time after the divorce was 7 filed do you recall any discussions with Stacy 8 Randall about her selling shares in Windy 9 Waters? 10 MR. SYLVAN: I'm going to object to the 11 extent answering will require you to disclose 12 communications you had in private with Stacy while 13 you were still living together. 14 A. Yeah, it would. 15 Q. Is your recollection that the mediation occurred 16 before the divorce was filed? 17 A. I'm sorry, what? 18 Q. Is it your recollection that there was a mediation 19 before the divorce was filed? 20 A. I, I still don't understand what -- 21 Q. Did you and Stacy with, with lawyers or with not, 22 have a mediation before you filed for divorce? 23 A. No. 24 Q. Okay. So the mediation, you're thinking of the 25 mediation it seems, you recall a mediation</p>

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<p>1 occurring; right?</p> <p>2 A. Yes.</p> <p>3 Q. And it was after the divorce was filed?</p> <p>4 A. Yes.</p> <p>5 Q. Okay. And we just established that you would</p> <p>6 agree that you were not living together as of the</p> <p>7 time that the divorce was filed; right?</p> <p>8 MR. SYLVAN: I'm going to object to the</p> <p>9 extent it mischaracterizes his prior testimony.</p> <p>10 A. I don't, I don't know.</p> <p>11 Q. Okay. Maybe I misunderstood.</p> <p>12 A. I don't know for sure.</p> <p>13 Q. Maybe I misunderstood here, but this was Exhibit 1</p> <p>14 where it showed different addresses and a date of</p> <p>15 April 1st, 2019.</p> <p>16 A. This is actually the petition for the divorce,</p> <p>17 this is --</p> <p>18 Q. Don't let me tell you that. Take a look at it</p> <p>19 yourself and see if you would agree with it.</p> <p>20 A. Petition for, okay, okay. I don't remember the</p> <p>21 timeline of all this, but it sure appears from</p> <p>22 this that that would be so.</p> <p>23 Q. So then, then would you agree that by the time</p> <p>24 there was a mediation in the divorce, that you and</p> <p>25 Stacy weren't living together; right?</p>	<p>1 put on the record previously.</p> <p>2 A. I don't recall her saying anything.</p> <p>3 Q. Is there anything that you recall Stacy's lawyer</p> <p>4 saying during the course of the mediation about</p> <p>5 Stacy selling shares in Windy Waters?</p> <p>6 MR. SYLVAN: Same objection.</p> <p>7 THE WITNESS: So do I answer that or not?</p> <p>8 MR. DOAN: Answer with the caution that</p> <p>9 you should not review anything that your divorce</p> <p>10 attorney and you spoke about in private.</p> <p>11 A. Okay. Yes.</p> <p>12 Q. Okay. What did Stacy's lawyer say about Stacy</p> <p>13 selling shares in Windy Waters?</p> <p>14 A. She just told us that she sold shares in Windy</p> <p>15 Waters.</p> <p>16 Q. So after the fact, as in it was, it was something</p> <p>17 that had occurred?</p> <p>18 A. This was the first thing that came about at the</p> <p>19 mediation.</p> <p>20 Q. And to clarify, Stacy's lawyer said she had</p> <p>21 redeemed shares as it had happened or that she was</p> <p>22 going to?</p> <p>23 A. It had happened, I believe.</p> <p>24 Q. Do you recall when this mediation took place, a</p> <p>25 year or a month?</p>
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<p>1 A. By the time of the mediation, yes.</p> <p>2 Q. Then what at mediation was discussed about Stacy</p> <p>3 possibly selling stock?</p> <p>4 MR. DOAN: I'm just going to caution that</p> <p>5 mediation is very vague. To the extent you were</p> <p>6 represented by counsel during your mediation and</p> <p>7 you were in breakout rooms, do not review, reveal</p> <p>8 any communications between you and your attorney</p> <p>9 at the time, your divorce attorney.</p> <p>10 MR. SYLVAN: I'm going to have same</p> <p>11 objection, and form.</p> <p>12 Q. I'm going to make it a little simpler to make that</p> <p>13 clearer for you. You had a mediation. Was there</p> <p>14 a mediator with you as well? Do you know what a</p> <p>15 mediator is?</p> <p>16 A. There was a lawyer that did the mediation.</p> <p>17 Q. Okay. And you had a lawyer yourself?</p> <p>18 A. Yes.</p> <p>19 Q. And Stacy had a lawyer?</p> <p>20 A. Yes.</p> <p>21 Q. Right?</p> <p>22 Is there anything during the mediation</p> <p>23 that you recall Stacy saying about selling shares</p> <p>24 in Windy Waters?</p> <p>25 MR. SYLVAN: Same objection that counsel</p>	<p>1 A. I don't remember the exact date, no, or the</p> <p>2 month.</p> <p>3 Q. It was aft -- before the divorce was final, I</p> <p>4 assume; right?</p> <p>5 A. That is correct.</p> <p>6 Q. Okay. Do you recall whether it was before or</p> <p>7 after you started receiving maintenance payments</p> <p>8 from Ms. Randall?</p> <p>9 MR. DOAN: Object to form.</p> <p>10 MR. SYLVAN: And to the extent it calls</p> <p>11 for a legal conclusion.</p> <p>12 MR. DOAN: Join.</p> <p>13 THE WITNESS: So I don't answer that?</p> <p>14 MR. DOAN: You can answer if you</p> <p>15 understand the question.</p> <p>16 A. It seems to me, I don't remember exactly, but it</p> <p>17 seems to me during mediation is when a lot of this</p> <p>18 stuff was handled and came to a conclusion.</p> <p>19 Q. Okay. Do you recall a time that you began</p> <p>20 receiving \$4,000 a month from Stacy during the</p> <p>21 course of your divorce proceedings?</p> <p>22 MR. SYLVAN: Objection. Form.</p> <p>23 MR. DOAN: Join.</p> <p>24 A. I remember getting money from Stacy during that</p> <p>25 time, yes.</p>

<p style="text-align: right;">Page 172</p> <p>1 Q. Do you -- Was the mediation before or after you 2 started getting \$4,000 a month from Stacy? 3 A. After. 4 Q. Okay. Going back to Stacy's lawyer's comment that 5 her shares had been sold in Windy Waters, was that 6 the first time you learned that Stacy's shares in 7 Windy Waters had been sold? 8 MR. SYLVAN: I'm going to object, form, 9 and calls for speculation. 10 MR. DOAN: Join. 11 A. Boy, I don't know. 12 Q. Okay. 13 A. I don't know. 14 Q. And other than the fact that the shares had been 15 redeemed, what else did Stacy's lawyers, if 16 anything, say about Stacy redeeming her shares? 17 A. I think I came away that she redeemed all of her 18 shares, and that was a shock to me, but especially 19 during that time of the divorce. 20 Q. Okay. And, and it was a shock that she had 21 redeemed all of her shares as opposed to less than 22 all of them? 23 A. Right. 24 Q. That's the part that shocked you, the fact that it 25 was all of them?</p>	<p style="text-align: right;">Page 174</p> <p>1 A. I, I don't remember anything else. 2 Q. And I think you said that that was one of the 3 first topics for discussion at mediation; is that 4 right? 5 A. I believe so. 6 Q. Okay. And is that because you and Stacy had to 7 figure out how that impacted your, your divorce? 8 MR. SYLVAN: Objection. Foundation. 9 MR. DOAN: Object to form as well. 10 A. I, I don't know. 11 Q. What's your understanding of why it was discussed 12 at mediation that she had redeemed all of her 13 shares? 14 MR. DOAN: I'm just going to caution you 15 not to reveal any communications between you and 16 your divorce attorney at the time. 17 THE WITNESS: Okay. So I shouldn't 18 answer that? 19 MR. DOAN: No, you can answer but don't 20 reveal anything that, that your divorce attorney 21 told you at the time of the divorce, during the 22 divorce proceedings. 23 A. I think one of, one of the reasons for the 24 mediation was to establish where we were going to 25 go financially, and then we were going to try to</p>
<p style="text-align: right;">Page 173</p> <p>1 A. Yeah. 2 Q. Why was that a shock to you? 3 A. Normally she would get what she needed and then 4 move on. It's not, and she did not need that, 5 especially at that time of the divorce. 6 Q. Did not need what exactly? 7 A. The full amount. 8 Q. The dollar amount that she got, she didn't need 9 that much money? 10 A. Right. 11 Q. Did Stacy's lawyer tell you the dollar amount that 12 she got during mediation? 13 MR. SYLVAN: Objection. Form. 14 MR. DOAN: Join. 15 A. Yes. 16 Q. Do you recall whether that was the first time you 17 had learned the amount that she got? 18 A. Yes. 19 Q. And it was the first time you had learned the 20 amount she got? 21 A. Yeah. 22 Q. And I think maybe I interrupted you. Is there 23 anything else that Stacy's lawyer said about the 24 fact she had redeemed all of her shares? 25 MR. SYLVAN: Objection. Form.</p>	<p style="text-align: right;">Page 175</p> <p>1 make a settlement at that mediation, also. 2 Q. Okay. And did the mediator explain that one of 3 the things that had to be done was to figure out 4 how to divide the property that the two of you 5 owned? 6 MR. SYLVAN: Objection. Form and 7 foundation. 8 A. I don't know if we talked about it, and I don't 9 remember for sure, but I know that we did find a 10 solution for that by the end of that mediation. 11 Q. And when you're talking about a solution, is it 12 that there was a, a settlement was reached and you 13 were able to agree upon how to divide your assets 14 at that time? 15 A. Yes. 16 Q. Okay. Was that eventually reflected in a document 17 that became part of your divorce judgment? 18 A. I would, yes, I would think so. 19 Q. Do you recall what the agreement was reached with 20 respect to her, the money she got from redeeming 21 her shares? 22 MR. SYLVAN: Objection. Form. Calls for 23 speculation and foundation. 24 A. Can you say that, repeat that again. 25 Q. Sure. What's your understanding of, of what</p>

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<p>1 happened to the \$1.3 million that Stacy got for 2 selling her shares? Did you get some benefit of 3 that?</p> <p>4 MR. DOAN: Object to form.</p> <p>5 MR. SYLVAN: Compound.</p> <p>6 MR. DOAN: Same, join.</p> <p>7 A. You know, in my thinking right now, I don't 8 remember at the time, but in my thinking right 9 now, if I would have heard that that's all that 10 she got, I probably wouldn't have went for it.</p> <p>11 Q. But you did, you did go for it, so you didn't know 12 the amount that she received?</p> <p>13 A. I did not --</p> <p>14 MR. DOAN: Objection.</p> <p>15 A. -- go for it.</p> <p>16 Q. Okay. Understood.</p> <p>17 So you understand that you didn't get a 18 portion of the money that she received from 19 redeeming her shares?</p> <p>20 MR. SYLVAN: Objection. Mischaracterizes 21 prior testimony. Foundation.</p> <p>22 A. I just figured --</p> <p>23 MR. DOAN: Do you need the question read 24 back?</p> <p>25 THE WITNESS: Huh?</p>	<p>1 Q. After the mediation, was there, what was the next 2 time that you talked with Stacy about her 3 redeeming her shares?</p> <p>4 MR. SYLVAN: Same objection and same 5 caution.</p> <p>6 A. We were still married so --</p> <p>7 MS. WITTENBERG: Are you instructing him 8 not to answer a question about a discussion after 9 mediation occurred in the divorce?</p> <p>10 MR. SYLVAN: No, just while they were 11 still living together.</p> <p>12 Q. So I only want to know of any conversation you had 13 after the mediation occurred, and I think counsel 14 is saying he's not telling you not to answer that 15 question, okay. So when was the next time after 16 mediation that you spoke with Stacy about her 17 redeeming all of her shares in Windy Waters?</p> <p>18 A. I don't remember the exact date, but I know it was 19 very soon after the mediation that I was asking 20 her why would she do that.</p> <p>21 Q. Okay. And what did she say?</p> <p>22 A. She said she didn't have a choice, she was going 23 to get her money for her stock. They told her she 24 had to sell all of it.</p> <p>25 Q. What else did she say?</p>
<p>1 MR. DOAN: Do you need the question read?</p> <p>2 THE WITNESS: What?</p> <p>3 MR. DOAN: Do you need the question read 4 back?</p> <p>5 THE WITNESS: Sure.</p> <p>6 (Question read)</p> <p>7 MR. DOAN: Same objections.</p> <p>8 A. Yes.</p> <p>9 Q. After the mediation, any time after that 10 mediation, has there been an occasion or more than 11 one when you've talked with Stacy about her 12 redeeming all of her shares?</p> <p>13 A. Yes.</p> <p>14 Q. Can you, can you tell me about one of those times? 15 When was the first time that you talked with Stacy 16 after the mediation about her redeeming all of her 17 shares?</p> <p>18 MR. SYLVAN: I'm going to object, and 19 don't disclose communications you had while you 20 were still living with Stacy.</p> <p>21 MR. DOAN: Same caution.</p> <p>22 A. Well then I can't really answer that because we 23 were still married.</p> <p>24 Q. After the mediation --</p> <p>25 A. After the mediation.</p>	<p>1 A. I don't remember, but I do remember that.</p> <p>2 Q. Is there anything else you recall about that 3 conversation?</p> <p>4 MR. SYLVAN: Object to form.</p> <p>5 A. I recall that both of us were upset about it.</p> <p>6 Q. How could you tell that Stacy was upset?</p> <p>7 A. I lived with her for 40 years.</p> <p>8 Q. Was she crying?</p> <p>9 A. No, she wasn't outright crying. I think she 10 had -- I just know, I mean I just know that.</p> <p>11 Q. Did she seem angry?</p> <p>12 A. Huh?</p> <p>13 Q. Did she seem angry?</p> <p>14 MR. SYLVAN: Objection. Form. Calls for 15 speculation.</p> <p>16 A. She wasn't happy.</p> <p>17 Q. Okay. Did you, did she say anything about the 18 reasons that she asked in the first place to sell 19 shares?</p> <p>20 MR. SYLVAN: Object to form.</p> <p>21 MR. DOAN: Same objection. I'm just 22 going to clarify, we're talking after still, after 23 mediation?</p> <p>24 Q. I can rephrase that if that helps.</p> <p>25 So this conversation that you're thinking</p>

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<p>1 of that happened the first time after mediation, 2 did she say anything during that conversation 3 about the reasons that she sold all of her, the 4 rest of her shares in Windy Waters?</p> <p>5 A. She did not want to sell all of her shares. That 6 was the only way that they would let her get money 7 was to sell all of her shares. I don't know if 8 she wanted 50,000, a hundred thousand, but she was 9 just going to get enough for us to make it through 10 this, and so that wasn't her intentions to sell 11 all of it.</p> <p>12 Q. And those were things that she told you during 13 that conversation shortly after mediation that 14 you're thinking of?</p> <p>15 A. Yeah. And that fits right, right with how she was 16 through our entire marriage about selling all --</p> <p>17 MR. DOAN: I think --</p> <p>18 THE WITNESS: Okay.</p> <p>19 MR. DOAN: Just answer the question --</p> <p>20 THE WITNESS: Sorry.</p> <p>21 MR. DOAN: -- that's pending, Steve.</p> <p>22 Q. Did you ask any questions of her during that 23 conversation? Other than you said, why did you do 24 it, anything else you asked her about it?</p> <p>25 A. I don't remember.</p>	<p>1 A. I can't remember, no. I was just pretty --</p> <p>2 Q. Okay.</p> <p>3 A. -- upset.</p> <p>4 Q. And then you also mentioned you thought how much 5 it was, how much she got seemed like a joke.</p> <p>6 A. Yes.</p> <p>7 Q. Why did you think that?</p> <p>8 A. Well, the little that I know, it just seems to me, 9 and stuff I read it said through the years, that 10 the company was worth a lot more than what, than 11 what she ended up with.</p> <p>12 Q. Okay. Is there anything specific that comes to 13 mind as something that Reed had said that made you 14 think the company was worth a lot?</p> <p>15 A. I remember years and years ago that Reed threw out 16 like 50 million, 60 million, something like that, 17 years ago about the value of the company. So if 18 that was the value of the company being sold, then 19 1.3 million that Stacy received was just, just 20 wasn't right.</p> <p>21 Q. Do you remember -- Well, when Reed mentioned the 22 value being 50 million, is that a conversation 23 between just you and Reed, or was anyone else 24 around?</p> <p>25 A. I don't know who all was there. I remember it was</p>
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<p>1 Q. Where were you when you had this conversation?</p> <p>2 A. Probably at home and talking to her on the 3 phone.</p> <p>4 Q. Okay. Do you recall whether it was before or 5 after your divorce was finalized?</p> <p>6 A. I think it was before.</p> <p>7 Q. And I think you said you were both upset during 8 this conversation. Why were you upset? What, 9 what made you feel upset about it?</p> <p>10 A. Two things that upset me were that they made her 11 sell all of it, and the second thing was how much 12 it was. It was a joke to me.</p> <p>13 Q. Well, take those part by part. So that they made 14 her sell it all. During that conversation, did 15 Stacy tell you who made her sell it all?</p> <p>16 A. I don't remember.</p> <p>17 Q. Did Stacy report anything that, any of the details 18 of conversations she had with people at Windy 19 Waters about this stock sale?</p> <p>20 A. Seems --</p> <p>21 MR. SYLVAN: Objection. Form.</p> <p>22 A. Seems to me Reed's name was mentioned, and Michael 23 Kiesler's names was mentioned.</p> <p>24 Q. But nothing specific you remember that you can 25 remember about --</p>	<p>1 up north.</p> <p>2 Q. Was it up north at the family cottage?</p> <p>3 A. Yes.</p> <p>4 Q. Was your wife with you at the time, Stacy?</p> <p>5 MR. SYLVAN: Objection. Form.</p> <p>6 A. She was in the cottage, and me and Reed, I don't 7 know, maybe the guys all went out or something.</p> <p>8 Q. Do you recall whether you were, where you were at 9 the time, what you were doing?</p> <p>10 MR. SYLVAN: Objection. Form.</p> <p>11 A. No, I don't.</p> <p>12 Q. And am I understanding right that you don't know 13 one way or the other if Stacy was among the people 14 who was around when he said that?</p> <p>15 MR. SYLVAN: Objection. Mischaracterizes 16 his prior testimony.</p> <p>17 MR. DOAN: Join.</p> <p>18 A. No, I said that it was probably just the guys.</p> <p>19 Q. So you remember that she was, she was not around?</p> <p>20 MR. DOAN: Object to form.</p> <p>21 MR. SYLVAN: Object to form.</p> <p>22 A. I don't remember.</p> <p>23 Q. When you referred to just the guys, who would that 24 be?</p> <p>25 A. I don't know. I don't know. Could be my sons.</p>

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<p>1 Could be Reed's son.</p> <p>2 Q. Other than recalling that he used the number</p> <p>3 50 million in reference to the value of the</p> <p>4 company, do you remember anything else that Reed</p> <p>5 said during that conversation about giving an</p> <p>6 indication of the value of Windy Waters or Widen</p> <p>7 Enterprises?</p> <p>8 MR. SYLVAN: Objection. Mischaracterizes</p> <p>9 prior testimony. I believe he said 50 to</p> <p>10 60 million.</p> <p>11 MR. DOAN: So compound.</p> <p>12 A. It was, I mean that was a lot of years ago, too,</p> <p>13 so --</p> <p>14 MS. WITTENBERG: Could you read my</p> <p>15 question back, Janet.</p> <p>16 (Question read)</p> <p>17 MR. SYLVAN: Same objection and it</p> <p>18 further mischaracterizes his prior testimony.</p> <p>19 A. I, I don't know how to answer that.</p> <p>20 Q. And to address counsel's objection, so Reed, your</p> <p>21 memory was that Reed said the company was worth</p> <p>22 50 to 60 million during this conversation?</p> <p>23 A. Yes.</p> <p>24 Q. Is that right?</p> <p>25 A. I remember that.</p>	<p>1 Q. How many times approximately do you recall Reed</p> <p>2 talking to you about generally how the companies</p> <p>3 were doing?</p> <p>4 MR. DOAN: Object to form.</p> <p>5 MR. SYLVAN: Object to form.</p> <p>6 A. I, I'm not sure. I wouldn't know that exactly.</p> <p>7 Q. And I think you said this occurred frequently; did</p> <p>8 I hear that right?</p> <p>9 MR. SYLVAN: Objection. I believe that</p> <p>10 mischaracterizes his testimony.</p> <p>11 MR. DOAN: Join. I think the transcript</p> <p>12 will say on and off.</p> <p>13 A. I don't, I didn't say frequently. I'm not sure</p> <p>14 how many times that he had talked about the</p> <p>15 condition of the company.</p> <p>16 Q. Okay. And if I get the -- I'm not taking notes</p> <p>17 the whole time here, so if I get something wrong</p> <p>18 that you said, please just go ahead and tell me.</p> <p>19 I didn't mean to put words in your mouth there.</p> <p>20 But is there something you could say to describe</p> <p>21 the frequency that Reed would give, would tell you</p> <p>22 things about how Windy Waters or Widen Enterprises</p> <p>23 was doing?</p> <p>24 MR. SYLVAN: Objection. Form. Asked and</p> <p>25 answered.</p>
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<p>1 Q. And you said it was a number of years ago, but you</p> <p>2 don't know when it was specifically?</p> <p>3 A. No, I don't. I do remember it's quite a few years</p> <p>4 ago.</p> <p>5 Q. Was it before you and Stacy filed for divorce?</p> <p>6 A. Oh, yeah, way before that.</p> <p>7 Q. Okay. Was it while you were living in Florida?</p> <p>8 A. I don't, I don't remember the timeline. It was a</p> <p>9 ten-year period. It could have been before that.</p> <p>10 I don't, I'm not sure. I don't know.</p> <p>11 Q. Were there any other occasions besides the one you</p> <p>12 just told me about where Reed has given you an</p> <p>13 indication of the value of Widen Enterprises or</p> <p>14 Windy Waters?</p> <p>15 MR. SYLVAN: Objection. Form.</p> <p>16 MR. DOAN: Join.</p> <p>17 A. I, I think he had mentioned it on and off just</p> <p>18 every now and then.</p> <p>19 Q. Is there ever a time that you can remember that</p> <p>20 Reed gave you an indication of the value of Windy</p> <p>21 Waters or Widen Enterprises when Stacy was also</p> <p>22 part of the conversation?</p> <p>23 MR. DOAN: Object to form.</p> <p>24 MR. SYLVAN: Join.</p> <p>25 A. I don't remember.</p>	<p>1 MR. DOAN: Join.</p> <p>2 A. I, I don't know. It just, it was just</p> <p>3 conversation that would go on through the years,</p> <p>4 on and off. I --</p> <p>5 Q. Okay.</p> <p>6 A. It was not a lot of information, but sometimes it</p> <p>7 kind of gave me a little idea what condition the</p> <p>8 company was in.</p> <p>9 Q. Okay. Other than conversations with Reed, is</p> <p>10 there anything else that led you to form a belief</p> <p>11 that the amount that Stacy got for redeeming her</p> <p>12 shares was low?</p> <p>13 MR. DOAN: Object to form.</p> <p>14 MR. SYLVAN: I'm mostly going to object</p> <p>15 to the extent answering requires you to disclose</p> <p>16 communications you had with Stacy while you were</p> <p>17 married, living together, and instruct you not to</p> <p>18 disclose communications.</p> <p>19 A. I --</p> <p>20 MR. DOAN: Go ahead and try to answer,</p> <p>21 Steve, without disclosing --</p> <p>22 A. I don't know how to answer that.</p> <p>23 Q. Okay. I can try and phrase it a little bit</p> <p>24 differently to maybe knock out of one of the</p> <p>25 objections, make it little simpler.</p>

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<p>1        Other than discussions with Reed and 2        other than discussions with Stacy, is there 3        anything that caused you to form a belief about 4        Stacy's, the amount that she got for her shares to 5        be low?</p> <p>6        MR. SYLVAN: Objection to form, and I 7        will give you the same instructions and caution.</p> <p>8 A. As I said, years ago Reed had told me 50 to 9        60 million that he felt the company was worth, and 10       I knew it had to be worth a hell of a lot more 11       than that in today's world, and if you just figure 12       out percentage-wise what he thought it was worth 13       way back when, and it's got to be worth more today 14       than it was then, it just, it's a no-brainer to 15       think that something is not right.</p> <p>16 Q. And we were, kind of circling back now, we were 17       talking about a conversation soon after mediation 18       between you and Stacy, so I'm going to jump 19       forward in time a little bit. I think you 20       mentioned that you talked with her more than once 21       about her having redeemed her shares, so I'm going 22       to ask you for the next time that you can recall 23       talking with Stacy about her having redeemed her 24       shares.</p> <p>25       MR. SYLVAN: Objection. I believe that</p>	<p>1        MR. SYLVAN: Objection. That 2        mischaracterizes his testimony. I did not 3        understand that to be what he was saying.</p> <p>4 Q. Well, you tell me. I just want to know what 5        you're saying.</p> <p>6 A. What, what am I saying? I'm saying she got 7        ripped off, period. I mean that's just all it is. 8        I mean how -- You're asking me all -- Anyway.</p> <p>9 Q. Okay. Do you want to take a little break?</p> <p>10       MR. DOAN: He might need a break.</p> <p>11       MS. WITTENBERG: Let's take five, ten 12       minutes or so.</p> <p>13       (Break taken)</p> <p>14 Q. Before the break, Mr. Randall, we were talking 15       about discussions you had with Stacy following 16       your mediation and your divorce about Stacy having 17       redeemed all of her shares in Windy Waters and 18       Widen Enterprises. I want to know if there is any 19       other conversation that you, sitting here, can 20       recall in your mind occurring after that first one 21       that we talked about.</p> <p>22       MR. SYLVAN: Object to form.</p> <p>23 A. Yes, I'm sure there was times we talked after 24       that, but I don't remember when or what.</p> <p>25 Q. Okay. Do you right now sitting here know the date</p>
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<p>1        mischaracterizes his testimony.</p> <p>2 A. I don't, I don't remember.</p> <p>3 Q. Sitting here now, is there any other conversation 4        you can recall having with Stacy following 5        mediation to the present about her redeeming her 6        shares?</p> <p>7 A. To the present?</p> <p>8 Q. Right.</p> <p>9 A. I, I don't really recall.</p> <p>10 Q. You don't, as you're sitting here, you don't 11       recall any other times you've talked with Stacy 12       about --</p> <p>13 A. No, I, I recall talking to her, but I don't recall 14       what the conversations were.</p> <p>15 Q. Okay. And, and to be clear, you're saying you 16       think there were times that you --</p> <p>17 A. Yes.</p> <p>18 Q. -- talked -- Let me finish just for a clear 19       record. I know what you mean, I think, but I want 20       to make sure that the transcript shows it, too.</p> <p>21       You think that there were times after 22       that first conversation following mediation when 23       you did talk with her about her redeeming her 24       shares, but you don't recall specifically when 25       those were; is that right?</p>	<p>1        when Stacy redeemed the rest of her shares in 2        Windy Waters?</p> <p>3 A. It was right before the mediation.</p> <p>4 Q. Okay. I'll represent to you it was May 13, 2020, 5        and I'm assuming counsel will agree with me that's 6        sort of the date in time that this occurred. Do 7        you recall whether you had any discussions with 8        Ms. Randall on or before that date, before she 9        actually went through with redeeming all of her 10       shares, about her redeeming all of her shares?</p> <p>11       MR. SYLVAN: I'm going to object and 12        caution you not to disclose any communications you 13        had with Stacy while you were married and living 14        together.</p> <p>15       MR. DOAN: Same instruction. So if you 16        need the question read back, just --</p> <p>17       THE WITNESS: Do I need to answer it?</p> <p>18       MR. DOAN: You should answer but try not 19        to disclose any information, conversation you had 20        with Stacy during the time you were married.</p> <p>21       THE WITNESS: Okay.</p> <p>22 Q. I can rephrase it a different way that might help 23        with this, so is there any conversation that you 24        recall having with Ms. Randall between May of 2019 25        and May of 2020 about her redeeming shares in</p>

<p style="text-align: right;">Page 192</p> <p>1 Windy Waters?</p> <p>2 MR. SYLVAN: Object to form.</p> <p>3 A. About her redeeming them or about them, about the</p> <p>4 redemption that she made; what are you asking?</p> <p>5 Q. Before it was done, so the reason I picked that</p> <p>6 May 13th date just for your context is that's when</p> <p>7 it, that's when it occurred, okay. So I want to</p> <p>8 know before she actually redeemed the rest of her</p> <p>9 shares and in the year leading up to it, did you</p> <p>10 have any discussions with her about her redeeming</p> <p>11 the rest of her shares?</p> <p>12 MR. SYLVAN: Objection. Vague as to</p> <p>13 time.</p> <p>14 A. Not that I remember.</p> <p>15 (Exhibits <a href="#">13</a> and <a href="#">14</a> marked for</p> <p>16 identification)</p> <p>17 A. Is this the same thing?</p> <p>18 Q. They're different documents. You've been handed</p> <p>19 two exhibits; there's Exhibit <a href="#">13</a> and Exhibit <a href="#">14</a>.</p> <p>20 They may be useful to look at side by side. And,</p> <p>21 unfortunately, this is the best copies that I</p> <p>22 have, so I apologize in advance for the incredible</p> <p>23 fuzziness on this.</p> <p>24 Let's start with Exhibit <a href="#">13</a>. Do you see</p> <p>25 your name in the middle of the first page,</p>	<p style="text-align: right;">Page 194</p> <p>1 Q. Okay. And do you see a date there listed as</p> <p>2 May 13th, 2020?</p> <p>3 A. Yes.</p> <p>4 Q. Okay. And turn back to the front page again.</p> <p>5 In the bottom section there, it looks like there's</p> <p>6 an address written of 611 or maybe 1116?</p> <p>7 A. Avocet Ridge Drive.</p> <p>8 Q. Is that an address you recognize?</p> <p>9 A. Yes.</p> <p>10 Q. I think we talked last time this was a property</p> <p>11 you and/or Stacy Randall owned either individually</p> <p>12 or through an entity?</p> <p>13 MR. SYLVAN: Objection to the extent that</p> <p>14 it mischaracterizes prior testimony.</p> <p>15 MR. DOAN: Same objection.</p> <p>16 A. Do I answer that or not?</p> <p>17 Q. Yes, you answer.</p> <p>18 MR. DOAN: You can answer if you</p> <p>19 understood the question.</p> <p>20 A. Can you read me back the question.</p> <p>21 Q. Sure. I'll try a different way here.</p> <p>22 The address you see listed here, this</p> <p>23 Avocet Ridge Drive address, does that correspond</p> <p>24 to a property that you or Stacy or both of you</p> <p>25 owned individually or through an entity?</p>
<p style="text-align: right;">Page 193</p> <p>1 Steven T. Randall?</p> <p>2 A. Yes.</p> <p>3 MR. SYLVAN: I'm going to object to</p> <p>4 foundation. The quality of this, of both these</p> <p>5 exhibits is very poor so I just want to put that</p> <p>6 on the record.</p> <p>7 Q. Understood.</p> <p>8 Turn to the last page of Exhibit <a href="#">13</a>. Do</p> <p>9 you see a signature on it?</p> <p>10 A. Yes.</p> <p>11 Q. Does it appear to be your signature?</p> <p>12 A. This is, it's pretty hard to read this because of</p> <p>13 the poor quality.</p> <p>14 Q. Understood, and I agree it is, it is hard to read,</p> <p>15 but looking at this, do you think it looks like</p> <p>16 your signature or not?</p> <p>17 MR. SYLVAN: Objection. Foundation.</p> <p>18 Q. You've seen your signature many times, I assume,</p> <p>19 Mr. Randall?</p> <p>20 A. You know --</p> <p>21 MR. DOAN: Just focus on, her question</p> <p>22 is, do you recognize your signature or not. Just</p> <p>23 answer that.</p> <p>24 A. It's very poor, but, yeah, it looks like my</p> <p>25 signature.</p>	<p style="text-align: right;">Page 195</p> <p>1 MR. DOAN: I'm going to object.</p> <p>2 Compound.</p> <p>3 MR. SYLVAN: And object, vague as to time</p> <p>4 and foundation.</p> <p>5 A. You know, by looking at the forms here, I would</p> <p>6 say, yeah, it would be me and Stacy.</p> <p>7 Q. And I guess I'm not really too concerned about</p> <p>8 which of you or who owned it necessarily. I just,</p> <p>9 it's a property that you were affiliated with at</p> <p>10 some point in time; right?</p> <p>11 A. It appears, yes.</p> <p>12 Q. Okay. And just, if I can actually, is it 6116</p> <p>13 Avocet Ridge, or is it a different number, if you</p> <p>14 remember?</p> <p>15 MR. DOAN: Same.</p> <p>16 A. Yeah.</p> <p>17 Q. And 6116 Avocet Ridge, is that a property that the</p> <p>18 two of you ever lived at?</p> <p>19 A. No.</p> <p>20 Q. Was it a rental property that one or both of you</p> <p>21 own?</p> <p>22 MR. SYLVAN: Objection. Asked and</p> <p>23 answered in the prior session.</p> <p>24 MR. DOAN: Compound. Objection.</p> <p>25 Compound.</p>

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<p>1           THE WITNESS: So do I answer that?</p> <p>2           MR. DOAN: Yes, go ahead if you</p> <p>3         understood the question.</p> <p>4 A. Yes, yes.</p> <p>5 Q. Okay. Do you, again, not looking at the documents</p> <p>6         necessarily, just from memory, do you recall how</p> <p>7         long you owned that property, roughly?</p> <p>8 A. No, I don't.</p> <p>9 Q. Okay. Do you, outside of seeing these documents,</p> <p>10        do you recall whether or not you owned them the</p> <p>11        time you were, around the time you were going</p> <p>12        through divorce proceedings?</p> <p>13           MR. SYLVAN: Objection. Vague as to</p> <p>14         time.</p> <p>15 A. I, I don't know.</p> <p>16 Q. Do you remember having owned this property even</p> <p>17        after you moved away from Florida?</p> <p>18           MR. SYLVAN: Same objection.</p> <p>19 A. Yes.</p> <p>20 Q. It seemed like most of the Florida properties were</p> <p>21        sold while you were still living in Florida; is</p> <p>22        that accurate?</p> <p>23           MR. SYLVAN: Objection. Mischaracterizes</p> <p>24         prior testimony, and foundation.</p> <p>25           MR. DOAN: Join.</p>	<p>1         indicate to you and remind you whether or not you</p> <p>2         owned the property on Avocet Ridge Drive in 2020.</p> <p>3           MR. SYLVAN: I'm going to object to form,</p> <p>4         and calls for a legal conclusion.</p> <p>5 A. It appears that, that we owned it in 2020.</p> <p>6 Q. Can you tell from looking at this form what, what</p> <p>7         the form was for?</p> <p>8 A. I can't really read it to what it says on the top</p> <p>9         there. It seems Mortgage, and then there's a,</p> <p>10        might be Assistance Application.</p> <p>11 Q. That's how I read it, too. Do you have memory of</p> <p>12        filling out a Mortgage Assistance Application in</p> <p>13        2020?</p> <p>14 A. Whenever this is, yeah, that's what it says.</p> <p>15 Q. And what was the purpose of completing a Mortgage</p> <p>16        Assistance Application in May of 2020?</p> <p>17           MR. DOAN: I'm just going to object to</p> <p>18         form.</p> <p>19           To the extent that you remember.</p> <p>20 A. I guess I don't remember exactly why.</p> <p>21 Q. Was there a mortgage on this Avocet Ridge Drive</p> <p>22        property that you owned?</p> <p>23           MR. SYLVAN: Objection. Vague as to</p> <p>24         time.</p> <p>25 A. Yes.</p>
<p>1 A. I don't know that to be true or not.</p> <p>2 Q. Okay. And around the time that you were going</p> <p>3         through the divorce proceedings did you own more</p> <p>4         than one Florida property?</p> <p>5           MR. DOAN: Object to form.</p> <p>6           MR. SYLVAN: Calls for a legal</p> <p>7         conclusion.</p> <p>8 A. I have no idea.</p> <p>9 Q. Do you have a recollection of there being one last</p> <p>10        Florida property at some point in time that you</p> <p>11        still owned?</p> <p>12           MR. DOAN: Object to form.</p> <p>13 A. No, I don't remember.</p> <p>14 Q. Okay. Now, looking at this document, do you --</p> <p>15        Take a look at it the best that you can and tell</p> <p>16        me if there's anything that you see on this that</p> <p>17        reminds you of whether or not you owned this</p> <p>18        property in May of 2020.</p> <p>19           MR. SYLVAN: I'm going to object to</p> <p>20         foundation, the same issues with the quality of</p> <p>21         this exhibit.</p> <p>22           MR. DOAN: I'll join. Are you asking him</p> <p>23         to look at both the documents?</p> <p>24 Q. I'm sorry. Just <u>13</u>. Take a look at Exhibit 13</p> <p>25         and see if there's anything in there that would</p>	<p>1 Q. Did there come a time when you and/or Stacy were</p> <p>2         finding it difficult to make payments on the</p> <p>3         mortgage?</p> <p>4 A. Yes.</p> <p>5           MR. SYLVAN: Objection. Form.</p> <p>6 Q. Did you or Stacy or both of you ask the lender to</p> <p>7         assist with the mortgage on the property?</p> <p>8 A. It appears that we did.</p> <p>9 Q. Okay. Do you remember doing that?</p> <p>10 A. I remember, yeah, I remember doing that, yeah.</p> <p>11 Q. And so let me back up.</p> <p>12           The, there were mortgage payments for, to</p> <p>13         pay for the mortgage on this Avocet Ridge Drive</p> <p>14         Florida address; right?</p> <p>15 A. Yeah.</p> <p>16 Q. Okay. Who was making those payments, if you</p> <p>17         recall? Was it you or Stacy?</p> <p>18 A. Me.</p> <p>19 Q. Did the lender -- Do you recall who the lender was</p> <p>20         for this mortgage?</p> <p>21           MR. DOAN: Go off your memory.</p> <p>22 A. No.</p> <p>23 Q. Do you recall whether there was a lender in</p> <p>24         Florida for this property?</p> <p>25           MR. SYLVAN: Objection. Form.</p>

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<p>1 A. I don't remember.</p> <p>2 Q. And so with the mortgage payments that you were 3 paying, am I understanding right that you were at 4 a point having a hard time making those 5 payments?</p> <p>6 A. That's correct.</p> <p>7 Q. And did you then ask the lender to make an 8 adjustment to the mortgage?</p> <p>9 A. I don't know if we asked them for an adjustment. 10 I just know that we asked them if there was any 11 help to give us to help rectify this situation.</p> <p>12 Q. Okay. And is that the purpose of the form that we 13 looked at that was Exhibit 13 was to ask if there 14 was anything that the bank could do to provide 15 assistance with the mortgage?</p> <p>16 A. I --</p> <p>17 MR. DOAN: Objection to the extent it 18 calls for a legal conclusion. I also will say the 19 document speaks for itself.</p> <p>20 MR. SYLVAN: Join.</p> <p>21 A. I believe we talked to them, and they suggested 22 that we fill this out.</p> <p>23 Q. Do you recall the name of any individual that you 24 were speaking with?</p> <p>25 A. No.</p>	<p>1 A. That is correct.</p> <p>2 Q. Do you -- Was there -- So on this property, this 3 Avocet Ridge Drive property, eventually it 4 resulted in a short sale; is that right?</p> <p>5 A. That's what you're telling me.</p> <p>6 Q. I don't want to know what, I'm asking what you 7 remember. Do you remember that the Avocet Ridge 8 Drive property that you and/or Stacy or the both 9 of you owned eventually turned into a short sale?</p> <p>10 A. I believe that's true.</p> <p>11 Q. Okay. Was there any mortgage assistance offered 12 or provided by the lender before it got to a short 13 sale point?</p> <p>14 MR. DOAN: Object to form.</p> <p>15 MR. SYLVAN: Join.</p> <p>16 A. I, I don't remember.</p> <p>17 Q. Do you have a memory of how much money was owed on 18 the mortgage?</p> <p>19 MR. SYLVAN: Objection. Vague as to 20 time.</p> <p>21 MR. DOAN: Join.</p> <p>22 A. No.</p> <p>23 Q. Okay. Do you recall how much was owed on the 24 mortgage at the time of the short sale?</p> <p>25 A. No, I don't remember.</p>
<p>1 Q. But it was someone on behalf of the lending 2 institution, the lender?</p> <p>3 MR. DOAN: Objet to form.</p> <p>4 A. It was -- What are you asking?</p> <p>5 Q. I wanted to know who you were having conversations 6 with about when you were, when you were told you 7 should try this form.</p> <p>8 A. Somebody at the lender.</p> <p>9 Q. Okay. Did, do you recall what happened after you 10 submitted this form? Did you get the assistance 11 you needed?</p> <p>12 MR. DOAN: Objection. Compound.</p> <p>13 A. Not exactly, no.</p> <p>14 Q. Do you remember there being a short sale for this 15 property after this application was submitted?</p> <p>16 MR. SYLVAN: Objection. Form.</p> <p>17 A. Yes.</p> <p>18 Q. Okay. Do you understand what a short sale is?</p> <p>19 A. Yes.</p> <p>20 Q. Can you describe in your words what you understand 21 it to be?</p> <p>22 A. You sell the property without getting enough to 23 pay off the mortgage.</p> <p>24 Q. Okay. And in that instance, the lender gets less 25 than what they were owed on the mortgage; right?</p>	<p>1 Q. Do you have any memory of how much the difference 2 was between what the amount was that was owed on 3 the mortgage and how much the property sold for?</p> <p>4 A. No.</p> <p>5 MR. SYLVAN: Objection. Asked and 6 answered.</p> <p>7 MR. DOAN: I'm going to join in that 8 objection.</p> <p>9 A. No, I don't.</p> <p>10 Q. Did you understand this form to be, Exhibit 13 11 that we talked about, to be related to the short 12 sale?</p> <p>13 MR. DOAN: Objet to form.</p> <p>14 MR. SYLVAN: Join. And foundation.</p> <p>15 A. I see real estate agents signed it at the bottom 16 here, so I assume at that point we were trying to 17 sell it.</p> <p>18 Q. So does that indicate to you that the form may 19 have been related to the possibility of a short 20 sale?</p> <p>21 MR. DOAN: Same objections.</p> <p>22 MR. SYLVAN: Join.</p> <p>23 A. I don't remember but probably.</p> <p>24 Q. Did you have a fax machine at your home in May 25 2020?</p>

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<p>1 MR. DOAN: I'm going to object to form.</p> <p>2 A. A fax machine. I have no idea how long we had a</p> <p>3 fax machine.</p> <p>4 Q. Okay. Do you have one now?</p> <p>5 A. No.</p> <p>6 Q. Okay. All right. If you look at the other</p> <p>7 exhibit here, Exhibit <u>14</u>, would you agree that</p> <p>8 this is the same form but different names on it?</p> <p>9 MR. SYLVAN: Objection to the extent that</p> <p>10 it mischaracterizes the two exhibits.</p> <p>11 MR. DOAN: I'll join. Could I get the</p> <p>12 question again, please.</p> <p>13 (Question read)</p> <p>14 MR. SYLVAN: Same objection, and it does</p> <p>15 misrepresent the two exhibits in comparison.</p> <p>16 MS. WITTENBERG: So you're telling me you</p> <p>17 think these are different forms?</p> <p>18 MR. SYLVAN: No.</p> <p>19 Q. Okay. Mr. Randall, would you agree that the</p> <p>20 documents Exhibit <u>13</u> and Exhibit <u>14</u>, except for</p> <p>21 the information filled in on them, are the same</p> <p>22 form?</p> <p>23 A. You know --</p> <p>24 MR. DOAN: I'm going to object to the</p> <p>25 extent the documents speak for themselves.</p>	<p>1 all?</p> <p>2 A. I don't remember it, no.</p> <p>3 Q. Okay. But you would say it does look like your</p> <p>4 handwriting?</p> <p>5 A. Yes.</p> <p>6 Q. Then turn to Exhibit <u>13</u> -- I'm sorry, <u>14</u>. It</p> <p>7 lists the same address in that bottom box of the</p> <p>8 6116 Avocet Ridge Drive; right?</p> <p>9 A. Yeah.</p> <p>10 Q. Is that your handwriting?</p> <p>11 MR. SYLVAN: Objection. Foundation.</p> <p>12 A. I, I don't know.</p> <p>13 Q. Okay.</p> <p>14 A. I don't think so, but I don't know.</p> <p>15 Q. Why don't we turn a couple pages in on Exhibit <u>14</u>.</p> <p>16 So it has some -- I'm sorry, go to page 3 of it.</p> <p>17 There you go. It has some boxes with the, a zero</p> <p>18 on it. Is that how you, is that your handwriting?</p> <p>19 A. I --</p> <p>20 MR. SYLVAN: Objection.</p> <p>21 A. I don't know.</p> <p>22 MR. SYLVAN: Calls for speculation.</p> <p>23 A. I have no idea.</p> <p>24 MR. SYLVAN: Foundation.</p> <p>25 Q. Let's turn to the last page of Exhibit <u>14</u>. Do you</p>
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<p>1 MR. SYLVAN: Join.</p> <p>2 MR. DOAN: He's a layperson. You can</p> <p>3 continue, but I don't --</p> <p>4 MS. WITTENBERG: If we could just all</p> <p>5 agree that we're looking at the two. That's what</p> <p>6 I'm trying to get at here, they're two same</p> <p>7 forms.</p> <p>8 MR. SYLVAN: You said except for the</p> <p>9 names, and I don't see that as the case. There's</p> <p>10 different content.</p> <p>11 Q. Is the content that's not filled in, Mr. Randall,</p> <p>12 you're looking at documents that are the same</p> <p>13 template document from someone that you and</p> <p>14 Ms. Randall filled in on Exhibit <u>13</u> and</p> <p>15 Exhibit <u>14</u>; right?</p> <p>16 MR. DOAN: I'm going to state the same</p> <p>17 objection. I don't know that it's been</p> <p>18 established that he filled them out or that he</p> <p>19 remembers filling them out.</p> <p>20 A. I, I'm lost. What are you asking?</p> <p>21 Q. Okay. Well, we actually can start there. That's</p> <p>22 a good point. Exhibit <u>13</u>, is that your</p> <p>23 handwriting on Exhibit <u>13</u>?</p> <p>24 A. Yes.</p> <p>25 Q. Okay. Do you remember filling out this form or at</p>	<p>1 see a signature and date at the bottom?</p> <p>2 A. Yes.</p> <p>3 Q. Okay. Is that your signature?</p> <p>4 A. I would say not.</p> <p>5 Q. Is it Stacy Randall's signature?</p> <p>6 A. It could be.</p> <p>7 Q. Okay. Does it look like her signature?</p> <p>8 A. It does.</p> <p>9 Q. And, again, the date here is May 13th, 2020; you</p> <p>10 see that?</p> <p>11 A. I do see that.</p> <p>12 Q. Were you, do you, have you seen this document, had</p> <p>13 you seen this document as signed by Ms. Randall,</p> <p>14 if you recall?</p> <p>15 MR. SYLVAN: Objection.</p> <p>16 MR. DOAN: I object to form.</p> <p>17 MR. SYLVAN: Join.</p> <p>18 Q. Prior to today.</p> <p>19 A. I don't remember.</p> <p>20 Q. Do you have any memory of meeting with Ms. Randall</p> <p>21 on May 13th, 2020, in relation to these documents?</p> <p>22 A. I don't remember.</p> <p>23 Q. You said the mortgage was paid by you. Did you</p> <p>24 ask Ms. Randall to complete this form? I'm</p> <p>25 talking about Exhibit <u>14</u>.</p>

<p style="text-align: right;">Page 208</p> <p>1 A. We were working with Tammy Brewster, a real estate 2 agent, so I really don't know who asked who 3 what.</p> <p>4 Q. Okay. Did you fill out Ms. Randall's form, 5 Exhibit --</p> <p>6 A. It doesn't appear that I did.</p> <p>7 Q. -- <u>14</u>?</p> <p>8 MR. DOAN: Let her finish the question.</p> <p>9 Q. From looking at it, can you tell who did fill out 10 Exhibit <u>14</u>?</p> <p>11 MR. SYLVAN: I'm going to object. 12 Foundation. The exhibit's quality, same issue.</p> <p>13 MR. DOAN: I'm also going to object as 14 speculation. I think he testified he doesn't 15 recognize his handwriting or least doesn't know on 16 Exhibit <u>14</u>. So to the extent you're asking 17 questions on who could it be on Exhibit <u>14</u>, I 18 think that's speculation.</p> <p>19 Q. Okay. Answer if you can.</p> <p>20 A. That's probably correct.</p> <p>21 MR. DOAN: No. Can we read back the 22 question.</p> <p>23 Steven, listen to the question.</p> <p>24 (Question read)</p> <p>25 A. No.</p>	<p style="text-align: right;">Page 210</p> <p>1 Q. And you've seen deeds that the two of you signed; 2 right?</p> <p>3 A. Yes.</p> <p>4 Q. On occasions that you have seen her sign a 5 document, did, was it her practice to review the 6 document before signing it?</p> <p>7 MR. SYLVAN: Objection. Calls for 8 speculation.</p> <p>9 MR. DOAN: I'm going to join.</p> <p>10 A. I think, I think when --</p> <p>11 MR. DOAN: Can we get the question, can 12 we have the question read back.</p> <p>13 (Question read)</p> <p>14 A. Yes.</p> <p>15 Q. And by review, I want to make sure I'm specific 16 enough. Was it Ms. Randall's practice to read a 17 document before signing it?</p> <p>18 MR. DOAN: Same objections.</p> <p>19 MR. SYLVAN: Join.</p> <p>20 A. Yeah, I think we both would go over it.</p> <p>21 Q. Did Ms. Randall ever ask you to sign anything on 22 her behalf?</p> <p>23 MR. SYLVAN: I'm going to object. Don't 24 disclose conversations you had with Stacy while 25 you were married in private with her.</p>
<p style="text-align: right;">Page 209</p> <p>1 MR. DOAN: Do you need a break? Are you 2 okay?</p> <p>3 THE WITNESS: M-hm.</p> <p>4 MS. WITTENBERG: I am about to change 5 gears. Should we take a quick break here and 6 evaluate how much more we can do today?</p> <p>7 THE WITNESS: I'm okay.</p> <p>8 MR. DOAN: You want a break, you're 9 saying?</p> <p>10 MS. WITTENBERG: I don't need one. I'm 11 just happy to. We'll go ahead then.</p> <p>12 Q. Mr. Randall, I think you've established you're 13 familiar with Stacy Randall's signature; right?</p> <p>14 A. Yes.</p> <p>15 Q. You watched her sign her name before?</p> <p>16 A. I, yes.</p> <p>17 Q. Many times?</p> <p>18 MR. SYLVAN: Objection. Form.</p> <p>19 MR. DOAN: Join.</p> <p>20 A. Yes.</p> <p>21 Q. Have you seen her sign checks before?</p> <p>22 A. Have I seen her do it, no.</p> <p>23 Q. Have you seen checks that you know she has signed 24 with her signature on it?</p> <p>25 A. I, I don't know.</p>	<p style="text-align: right;">Page 211</p> <p>1 A. Okay. I, I don't know.</p> <p>2 Q. Okay. Have you ever signed Stacy's signature on 3 her behalf?</p> <p>4 A. Over 40 years, you know, she told me to sign 5 something, I probably would have done it.</p> <p>6 Q. Do you recall any specific instances where you did 7 sign Stacy's signature on, not her signing, but 8 you signing her name on a document?</p> <p>9 A. Not on a document, no.</p> <p>10 Q. Okay. Have you signed her name on something else?</p> <p>11 MR. SYLVAN: I'm going to object. I just 12 want to be clear, are you asking with her consent 13 or --</p> <p>14 MS. WITTENBERG: Either way.</p> <p>15 A. I, I don't know, I don't know. I just may have 16 over a 40-year period at some time put her 17 signature down that she wanted me to do. I don't 18 know.</p> <p>19 Q. Okay.</p> <p>20 A. But I would never do that on anything like 21 documents like this.</p> <p>22 Q. And by that, you mean documents like Exhibit 23 No. <u>14</u>; right?</p> <p>24 A. Right.</p> <p>25 Q. And that leads you to believe that that would have</p>

<p style="text-align: right;">Page 212</p> <p>1 been her signature and not you signing on her 2 behalf on Exhibit 14; right?</p> <p>3 MR. DOAN: I'm just going to object to 4 form.</p> <p>5 MR. SYLVAN: And mischaracterizes his 6 testimony.</p> <p>7 A. I, I would not do that.</p> <p>8 Q. And I think what you're saying is that, you're 9 saying it's theoretically possible you could have 10 signed her name at some point in the course of 11 your marriage, you just don't recall any occasion 12 when you would have signed --</p> <p>13 A. No, I don't.</p> <p>14 Q. -- her name?</p> <p>15 Okay. And I know we have talked about 16 you being familiar with her signature. Do you 17 remember there being a time that she shortened her 18 signature, made it just the letters S and L as 19 opposed to writing Stacy Lee out?</p> <p>20 MR. SYLVAN: Objection. Form and 21 foundation. Calls for speculation.</p> <p>22 MR. DOAN: Join. Can we read back the 23 question.</p> <p>24 (Question read)</p> <p>25 A. Yes, I remember her doing that.</p>	<p style="text-align: right;">Page 214</p> <p>1 A. What's that?</p> <p>2 Q. On the first page, it looks like this is a 3 Shareholder Agreement of Widen Colourgraphics, 4 L.T.D.</p> <p>5 A. Okay. Okay. Shareholder Agreement.</p> <p>6 Q. Now, does this refresh your memory as to whether 7 or not you were ever asked to sign documents 8 related to Widen Enterprises or Windy Waters?</p> <p>9 MR. SYLVAN: Objection. Foundation.</p> <p>10 A. Like I said, I did not remember, but that 11 definitely is my signature.</p> <p>12 Q. Okay. I'll also ask you to turn to page 18 of 13 this document.</p> <p>14 MR. DOAN: So this one. Not Bates.</p> <p>15 Q. I'm sorry, also, okay, yeah, 18 of the document, 16 which has the Bates number WINDY0033123. Okay. 17 Do you see a bunch of signatures on that page?</p> <p>18 A. I do.</p> <p>19 Q. Do you see a signature for Stacy Widen Randall?</p> <p>20 A. I do.</p> <p>21 Q. This is an example of a time when her signature 22 was a full spelled out signature instead of just 23 some letters?</p> <p>24 MR. SYLVAN: Objection. Form.</p> <p>25 A. I'm not an analyst, but it looks like her</p>
<p style="text-align: right;">Page 213</p> <p>1 Q. Did you sometimes have to sign documents related 2 to Windy Waters or Widen Enterprises?</p> <p>3 MR. DOAN: Object to form.</p> <p>4 MR. SYLVAN: Join.</p> <p>5 A. I don't really remember.</p> <p>6 (Exhibit 15 marked for identification)</p> <p>7 Q. Mr. Randall, you've been handed a document that's 8 been marked as Exhibit 15, and you can flip 9 through it if you'd like. I'm going to eventually 10 ask you to turn to the third to last page, which 11 has Windy0033128 on the bottom.</p> <p>12 Are you looking at a page that has your 13 name on it?</p> <p>14 A. I am.</p> <p>15 Q. And is that your signature above the line where it 16 says Steven Randall?</p> <p>17 A. It appears to be.</p> <p>18 Q. Do you have any recollection now looking at this 19 of signing this document?</p> <p>20 A. March 1992.</p> <p>21 MR. DOAN: Just --</p> <p>22 A. I, I don't remember.</p> <p>23 Q. Okay. Looking at the front of it, it looks like 24 it's a Shareholder Agreement of Widen 25 Colourgraphics, L.T.D. on the first page.</p>	<p style="text-align: right;">Page 215</p> <p>1 signature.</p> <p>2 Q. Okay. Do you remember ever being asked to sign 3 documents by Mark Widen?</p> <p>4 MR. DOAN: I'm going to object to form.</p> <p>5 A. That was so far back I, I really, I, I do 6 remember, though, and if it's money you sign 7 something, you just signed it.</p> <p>8 Q. So you do remember there were times that you were 9 asked to sign documents by Mark Widen?</p> <p>10 A. I didn't remember signing this, but I'm just 11 saying that when Stacy would sign something or 12 we'd be over at the house, that just put your 13 signature on, you don't read it, you don't do 14 anything, you just put your signature on.</p> <p>15 Q. Okay.</p> <p>16 A. And that's probably what I ended up doing here.</p> <p>17 Q. So there were times where you were asked to sign a 18 document by Mark Widen?</p> <p>19 A. Evidently, because here's a signed document by 20 me.</p> <p>21 Q. Okay. Do you think this document was something 22 that Mark Widen asked you to sign?</p> <p>23 MR. DOAN: Objection. Asked and 24 answered.</p> <p>25 A. It appears that way.</p>

<p style="text-align: right;">Page 216</p> <p>1 Q. And you mentioned that, okay, you think you didn't 2 read it before you signed it?</p> <p>3 MR. SYLVAN: Objection. Mischaracterizes 4 his prior testimony.</p> <p>5 MR. DOAN: Join.</p> <p>6 THE WITNESS: Do I answer it or not?</p> <p>7 MR. DOAN: Go ahead and answer it if you 8 understand the question. So can you read --</p> <p>9 A. I don't really know if I was given a chance to 10 read it over.</p> <p>11 Q. So there were times that you would sign documents 12 without reading them?</p> <p>13 A. I don't remember signing anything so I don't know 14 how I could answer whether there was times, so I 15 can't answer that.</p> <p>16 Q. Is it your practice to sign documents without 17 having read them?</p> <p>18 A. No, it is not mine.</p> <p>19 Q. Okay.</p> <p>20 A. But that seems to be -- Okay.</p> <p>21 Q. Would you have ever signed a document without 22 reading it first?</p> <p>23 MR. SYLVAN: Objection. Form.</p> <p>24 MR. DOAN: Join.</p> <p>25 A. I don't remember.</p>	<p style="text-align: right;">Page 218</p> <p>1 (Question read)</p> <p>2 A. Yes.</p> <p>3 Q. Okay. And this was an occasion at Mark Widen's 4 home?</p> <p>5 A. Probably.</p> <p>6 Q. Was it at a Sunday dinner at their home?</p> <p>7 A. Yeah.</p> <p>8 Q. Okay. Who else was present?</p> <p>9 A. I don't know. The whole family.</p> <p>10 Q. The Widen family?</p> <p>11 A. Yes.</p> <p>12 Q. And who told her that she could not review the 13 document before signing it?</p> <p>14 MR. DOAN: Objection.</p> <p>15 MR. SYLVAN: Objection. Form. And to 16 the extent it mischaracterizes his prior 17 testimony.</p> <p>18 MR. DOAN: Join.</p> <p>19 A. I don't know who said what, but I just know it was 20 a practice of when Mark Widen wanted something 21 signed, he'd just throw it in front of you and 22 say, sign it.</p> <p>23 Q. And by throw it in front of you, do you mean the 24 document in its entirety?</p> <p>25 MR. SYLVAN: Objection. Form.</p>
<p style="text-align: right;">Page 217</p> <p>1 Q. Okay. And I'm kind of unpacking something you 2 said in this testimony here that you think there 3 were times that Stacy was asked to sign something 4 when you were present; is that right?</p> <p>5 A. That's right.</p> <p>6 Q. Are you referring to the occasions at Mark Widen's 7 home?</p> <p>8 A. Yeah, mark Widen's home.</p> <p>9 Q. Are you recalling a specific instance when --</p> <p>10 A. No, I can't recall any. I mean this, you're 11 talking, this is 1992.</p> <p>12 Q. Right.</p> <p>13 A. This is way back.</p> <p>14 Q. Okay. And I think you said that there were times 15 that she was asked to sign a document that you 16 observed where she was told she needed to sign it 17 without reading it?</p> <p>18 MR. SYLVAN: Objection.</p> <p>19 Q. Is that right?</p> <p>20 MR. SYLVAN: I'm sorry. Objection to the 21 extent that mischaracterizes his prior testimony.</p> <p>22 MR. DOAN: Join.</p> <p>23 THE WITNESS: Do I answer that?</p> <p>24 MR. DOAN: Yes, but let's read it back so 25 you understand the question.</p>	<p style="text-align: right;">Page 219</p> <p>1 A. I think everything was there, yes.</p> <p>2 Q. And the occasion you're thinking of when Stacy was 3 asked to sign something but was told she couldn't 4 read it, are you saying she was handed the whole 5 document?</p> <p>6 MR. SYLVAN: Objection.</p> <p>7 A. You know, I really don't know. You're talking 8 about way back when.</p> <p>9 Q. Okay. What do you recall from the occasion when 10 she was asked to sign something?</p> <p>11 A. I just recall when she was asked to sign 12 something, that wasn't allowed for her to read 13 through it.</p> <p>14 MR. SYLVAN: I'm going to object to 15 you're referring to a specific occasion, and I 16 don't believe that reflects his testimony.</p> <p>17 Q. Is there a specific occasion you can recall when 18 Stacy was asked to sign something but told she 19 could not read it?</p> <p>20 A. It was so far back I just, I, I mean this was 21 back, way back when. And, yes, I do remember that 22 her dad saying, well, I've already read through 23 it, I made this form, it's all okay, you need to 24 sign it.</p> <p>25 Q. Okay. And then handing it to her and asking her</p>

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<p>1 to sign it?</p> <p>2 A. And have her sign it, yeah.</p> <p>3 Q. Is there a time limit given before she had to</p> <p>4 complete signing it?</p> <p>5 MR. SYLVAN: Objection. Form. Calls for</p> <p>6 speculation.</p> <p>7 A. Right now.</p> <p>8 Q. Did he say that she had to sign it on the spot?</p> <p>9 A. Pretty much.</p> <p>10 Q. Did Stacy ever say, no, I want to read the</p> <p>11 document?</p> <p>12 MR. SYLVAN: Objection. Calls for</p> <p>13 speculation.</p> <p>14 A. I, I don't know, I don't know how to answer</p> <p>15 that.</p> <p>16 Q. Well, to the best of your recollection, was there</p> <p>17 ever a time that Stacy objected and said, no, I</p> <p>18 don't want to sign it, I want to read it first?</p> <p>19 MR. SYLVAN: Same objection.</p> <p>20 A. I cannot imagine her doing that because it would</p> <p>21 really upset everything.</p> <p>22 Q. What do you mean by really upset everything?</p> <p>23 A. Somebody would get pissed because they, they</p> <p>24 weren't getting what they wanted right away.</p> <p>25 Q. By someone, are you referring to Mark Widen?</p>	<p>1 A. I was not with her all the time.</p> <p>2 Q. Sure. I'm only asking what times.</p> <p>3 A. When she went to work to sign something, I was not</p> <p>4 there.</p> <p>5 Q. Sure. Understood. I want to know times you were</p> <p>6 with Stacy when someone asked her to sign</p> <p>7 something related to Windy Waters or Widen</p> <p>8 Enterprises that she was told she could not look</p> <p>9 at the document by someone other than Mark Widen,</p> <p>10 did that ever occur that you can recall?</p> <p>11 MR. SYLVAN: Objection. Form.</p> <p>12 A. I, I --</p> <p>13 MR. SYLVAN: It calls for --</p> <p>14 A. I really don't remember.</p> <p>15 MR. DOAN: Same objection.</p> <p>16 MR. SYLVAN: Calls for speculation.</p> <p>17 A. Like I said, you're talking about years and years</p> <p>18 ago.</p> <p>19 Q. I think the answer is that, no, you don't recall a</p> <p>20 time that someone other than Mark Widen asked</p> <p>21 Stacy to sign something while you were there and</p> <p>22 didn't let her look at the document?</p> <p>23 MR. SYLVAN: Objection. Mischaracterizes</p> <p>24 his testimony.</p> <p>25 A. I don't know. I, I know what was expected of her,</p>
<p style="text-align: center;">Page 221</p> <p>1 A. M-hm.</p> <p>2 Q. Other than in the context of Mark Widen asking for</p> <p>3 signatures, have you ever observed somebody else</p> <p>4 asking Stacy Randall to sign something without</p> <p>5 letting her look at it?</p> <p>6 MR. SYLVAN: Objection. Form.</p> <p>7 A. It was carried on the same way with Reed.</p> <p>8 Q. Are there occasions -- Well, let's go back. Why</p> <p>9 don't you read back my last question.</p> <p>10 (Question read)</p> <p>11 MR. SYLVAN: Same objection.</p> <p>12 A. After Mark passed away, it was carried on the same</p> <p>13 way with Reed.</p> <p>14 Q. Okay. I'll try again.</p> <p>15 Have you observed a time that someone</p> <p>16 other than Mark Widen asked Stacy to sign</p> <p>17 something and told her she could not look at it?</p> <p>18 MR. SYLVAN: Objection. Calls for</p> <p>19 speculation.</p> <p>20 A. I, I really don't remember.</p> <p>21 Q. Okay. Do you recall any time that Stacy Randall</p> <p>22 was asked to sign something in your presence but</p> <p>23 not given the whole document?</p> <p>24 MR. SYLVAN: Objection. Form. And calls</p> <p>25 for speculation.</p>	<p style="text-align: center;">Page 223</p> <p>1 and that's all I can say. I mean she was expected</p> <p>2 just to sign it.</p> <p>3 Q. Okay. Again, I'm --</p> <p>4 A. I'm sure she felt the same way.</p> <p>5 Q. Okay. Is there an instance that you can think of</p> <p>6 that you can recall when someone other than Mark</p> <p>7 Widen while you were with her asked her to sign</p> <p>8 something and said, you can't look at the rest of</p> <p>9 the document?</p> <p>10 MR. SYLVAN: Objection. Form. Asked and</p> <p>11 answered.</p> <p>12 A. I, I have no idea. I have no idea. I know there</p> <p>13 was times when Mike Kiesler would have stuff for</p> <p>14 her to sign, and I don't think there was, I don't</p> <p>15 think she was given the time to read through it.</p> <p>16 Q. You're talking about times that you were with her</p> <p>17 and Mike Kiesler?</p> <p>18 A. No, I wasn't with her --</p> <p>19 Q. Okay.</p> <p>20 A. -- but I --</p> <p>21 MR. SYLVAN: I'm going to, I'm going to</p> <p>22 caution you not to disclose --</p> <p>23 THE WITNESS: Okay.</p> <p>24 MR. SYLVAN: -- disclose communications</p> <p>25 you had with her while you were married.</p>

<p style="text-align: right;">Page 224</p> <p>1 A. Okay.      2 Q. So, again, I'm trying to understand if there's any      3 occasion that you can think of that you were with      4 Stacy where you observed someone other than Mark      5 Widen asking her to sign a document related to the      6 business, Widen Enterprises or Windy Waters, and      7 not letting her see the document.      8           MR. SYLVAN: Objection to form.      9 A. I can't answer that.      10 Q. I do need you to answer it. There's a time you      11 can recall or not.      12 A. I feel there was maybe a couple times with Mike      13 Kiesler that she did not have time to read the      14 document before she signed it.      15 Q. Okay. And in those --      16 A. That, that I would have been in front of at the      17 time. What was said to bring it to the point, I'm      18 not sure.      19 Q. Okay. On those occasions, you're saying, I think      20 what you said is you don't recall if Mike Kiesler      21 said, you can't look at the whole document; right?      22           MR. SYLVAN: Objection. Mischaracterizes      23 his testimony.      24           MR. DOAN: Have it read back. Pay      25 attention to the question and then answer it.</p>	<p style="text-align: right;">Page 226</p> <p>1 what?      2 Q. Complete her signature.      3           MR. DOAN: I'm going to do objection,      4 asked and answered.      5           MR. SYLVAN: I'm going to join and calls      6 for speculation.      7           MR. DOAN: I think his testimony is he      8 doesn't really remember so, but --      9 A. And I don't.      10 Q. What gave you the impression that she was not      11 allowed to read the document?      12           MR. SYLVAN: I'm going to caution you not      13 to disclose communications you had with Stacy --      14 A. Okay.      15           MR. SYLVAN: -- in private when you were      16 married.      17 A. Okay. So that would have been --      18           MR. DOAN: Can you read the back      19 question.      20           (Question read)      21           MR. DOAN: So other than your      22 conversation with Stacy during your marriage, the      23 question.      24 A. Just what she's told me what.      25           MR. SYLVAN: I'm going to, I'm going to</p>
<p style="text-align: right;">Page 225</p> <p>1           (Question read)      2           MR. SYLVAN: Same objection.      3 A. I, I, I don't know exactly what was said. I don't      4 remember.      5 Q. Okay. And on the occasions you're thinking of      6 when Mike Kiesler asked Stacy to sign something,      7 are you thinking she was not given enough time to      8 read the document?      9 A. That is correct.      10 Q. Okay. Do you recall on those occasions what type      11 of document Stacy was signing?      12 A. No.      13           MR. SYLVAN: Objection. Calls for a      14 legal conclusion.      15 Q. Do you recall where this took place?      16 A. At the company.      17 Q. At the Widen Enterprises or Windy Waters office?      18 A. (Witness indicating).      19 Q. Yes?      20 A. Yes.      21 Q. Did, on those occasions, did Mike Kiesler set a      22 time limit on how long Stacy would have before she      23 would complete --      24           MR. DOAN: I'm going to --      25           THE COURT REPORTER: Before she would</p>	<p style="text-align: right;">Page 227</p> <p>1 caution you same caution, same objection.      2           THE WITNESS: Okay.      3 Q. From the conversation you observed between Mike      4 and Stacy, what gave you the impression that Stacy      5 was not going to be allowed to read the document      6 she was asked to sign?      7 A. Just what I saw. I mean just, you know, sign      8 here.      9 Q. She was handed --      10 A. That was about it. That was about it.      11 Q. So he was pointing to where she should sign --      12 A. Yeah.      13 Q. -- the document?      14           But was handed the whole document?      15           MR. SYLVAN: Objection.      16           Mischaracterizes.      17 A. I don't remember.      18           MR. SYLVAN: Calls for speculation.      19 A. I don't remember.      20           MS. WITTENBERG: Okay. Let's take a      21 short break here.      22           (Break taken)      23 Q. All right. We were talking before about documents      24 related to the business that you and Stacy were      25 asked to sign. I showed you an example of the</p>

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<p>1 Shareholder Agreement, which was Exhibit <a href="#">15</a>. It's      2 not tied to this particular document, but I'm      3 wondering if there's ever a time that you were      4 asked to sign something for Widen Enterprises or      5 Windy Waters that had a place for you to sign and      6 a place for Stacy to sign?</p> <p>7 A. Don't remember.</p> <p>8 Q. At all, any time that you were asked to sign      9 anything that had a signature spot for you and a      10 signature spot for Stacy?</p> <p>11 A. Don't remember.</p> <p>12 Q. Okay.</p> <p>13 (Exhibit <a href="#">16</a> marked for identification)</p> <p>14 Q. Okay. You've been handed what's been marked      15 Exhibit <a href="#">16</a>, and I will ask you to turn to the      16 third page, which has Windy0002070 at the bottom.      17 Do you see a bunch of signatures on that page?</p> <p>18 A. I do.</p> <p>19 Q. Do you see a signature for yourself on that      20 page?</p> <p>21 A. I do.</p> <p>22 Q. And do you see a signature for Stacy on that      23 page?</p> <p>24 A. I do.</p> <p>25 Q. It looks like it's dated January 1st of 1998; is</p>	<p>1 (Exhibit <a href="#">17</a> marked for identification)</p> <p>2 Q. You've been handed Exhibit <a href="#">17</a>. I will ask you to      3 turn to the second to last page of the document.      4 It has WINDY0001346 at the bottom. Okay. Do you      5 see your name on that page?</p> <p>6 A. I do.</p> <p>7 Q. And do you see a signature on a signature line for      8 Steven Randall?</p> <p>9 A. I do.</p> <p>10 Q. Is that your signature?</p> <p>11 A. I don't know.</p> <p>12 Q. Does it look like your signature?</p> <p>13 MR. SYLVAN: Objection. Form.</p> <p>14 A. I, I don't know.</p> <p>15 Q. What's calling you to question whether or not it's      16 your signature?</p> <p>17 MR. DOAN: I'm just going to object to      18 form.</p> <p>19 A. It's a pretty messy signature. I don't know.</p> <p>20 Q. I think last time you testified that in 2007, you      21 had cancer surgery, if I recall?</p> <p>22 A. Yes.</p> <p>23 Q. Did that impact how you signed your name in any      24 way?</p> <p>25 MR. SYLVAN: Objection.</p>
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<p>1 that right?</p> <p>2 A. Yeah.</p> <p>3 Q. Okay. If you don't recall, I'm, it's okay, but I      4 want to know if you remember signing this      5 document --</p> <p>6 A. No.</p> <p>7 Q. -- in 1998.</p> <p>8 MR. SYLVAN: Objection. Asked and      9 answered.</p> <p>10 A. No.</p> <p>11 Q. Okay. Do you recall an occasion where you were      12 handed a document with signature lines like this,      13 that looks like this for the business that Stacy      14 hadn't already signed but you were asked to sign?</p> <p>15 MR. SYLVAN: Objection. Form.</p> <p>16 MR. DOAN: Join.</p> <p>17 A. Don't remember.</p> <p>18 Q. Okay. On this occasion, do you have any      19 recollection of this occasion at all when you      20 signed this document?</p> <p>21 MR. DOAN: Objection. Asked and      22 answered.</p> <p>23 MR. SYLVAN: And form.</p> <p>24 A. No.</p> <p>25 Q. Okay.</p>	<p>1 MR. DOAN: Objection.</p> <p>2 MR. SYLVAN: Calls for an expert      3 opinion.</p> <p>4 A. I don't, don't remember.</p> <p>5 Q. Okay. Let's turn to -- I guess one more question      6 on this page. Do you have any recollection of      7 having signed this document?</p> <p>8 MR. DOAN: She's asking --</p> <p>9 Q. Sorry.</p> <p>10 MR. DOAN: -- still this page, do you      11 have a recollection signing this document?</p> <p>12 A. No, I don't.</p> <p>13 Q. Okay. Then if you could turn two, three pages up,      14 which has pages Windy0001343. Okay. And do you      15 seeing signatures on this page?</p> <p>16 MR. SYLVAN: I'm sorry. What page again?</p> <p>17 MS. WITTENBERG: 1343.</p> <p>18 A. Okay.</p> <p>19 Q. Do you see signatures for Stacy Randall on those,      20 on this page?</p> <p>21 MR. SYLVAN: Objection to form.</p> <p>22 A. Yes.</p> <p>23 Q. And those appear to be her signature?</p> <p>24 MR. SYLVAN: Objection. Form. Calls for      25 speculation.</p>

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<p>1           MR. DOAN: Join. 2 A. Can you repeat that. I didn't hear what you 3        said. 4 Q. Sure. Those signatures above the lines where it 5        says, Stacy Widen Randall, those appear to be her 6        signature? 7           MR. SYLVAN: Objection to form and calls 8        for speculation. 9           MR. DOAN: Same objection. 10 A. It appears to be. 11 Q. I'm going to one more one here. 12           (Exhibit 18 marked for identification). 13 Q. And you've been handed now Exhibit 18. I'm going 14        to ask you to turn to the last page. Do you see 15        your name on this page? 16 A. Yeah. 17 Q. Do you recognize, do you know what DocuSign is? 18 A. Yeah. 19 Q. Okay. Do you recall there being a time around 20        January 8th, 2013, that you DocuSigned a document 21        related to Widen Enterprises or Windy Waters? 22           MR. SYLVAN: Objection. Form. 23           MR. DOAN: Join. 24 A. Don't remember. 25 Q. You can put that one aside, too.</p>	<p>1        caution with respect to when you were still living 2        together. 3 A. I don't remember anyways. 4 Q. Then I will ask the question and give counsel a 5        chance to consider the privilege objection because 6        I believe it's been waived. 7           My question will still be then any time 8        ever that you have spoken with Stacy about her 9        signature stamp. And I can show the part where 10      she testified about it and let you decide if you 11      want to instruct him not to answer. 12           MR. SYLVAN: Sure. 13 Q. So one moment, Mr. Randall. 14           MS. WITTENBERG: It's page 196. And I 15      can reask the question. 16           MR. SYLVAN: Let me just take a look at 17      it. 18           (Discussion off the record) 19 Q. Was there ever a time, Mr. Randall, that you have 20      spoken with Stacy Randall about the signature 21      stamp that she had made? 22           MR. SYLVAN: I'm going to object and 23      instruct you not to answer with respect to 24      disclosing communications you would have had with 25      Stacy while were you married --</p>
<p>Page 233</p> <p>1           MR. SYLVAN: Was that Exhibit 18? 2           MR. DOAN: 18. 3           THE COURT REPORTER: That was 18. 4           MR. SYLVAN: Thanks. 5 Q. Are you aware that Ms. Randall had a signature 6        stamp that was made at one point in time for her 7        signature? 8 A. Yes. 9 Q. Okay. Were you with her when she had it made? 10 A. No. 11 Q. Have you seen it? 12           MR. SYLVAN: Objection. Form. Vague as 13      to time. 14 A. I, I think I've seen it. 15 Q. Okay. Have you ever spoken with Stacy about it? 16           MR. SYLVAN: I'm going to instruct you 17      not to answer to the extent answering would 18      disclose communications you had with Stacy during 19      your marriage. 20 A. So I don't answer that? 21 Q. We'll start by asking any time after April 1st of 22      2019, after you filed for divorce, was there any 23      occasion you spoke with Stacy about her signature 24      stamp? 25           MR. SYLVAN: I'm going to object. Same</p>	<p>Page 235</p> <p>1           THE WITNESS: Okay. 2           MR. SYLVAN: -- and living together. 3 Q. So, now, I have a few follow-up questions -- Are 4        you going to accept that instruction? 5 A. Yes. 6           MS. WITTENBERG: Okay. And this is the 7        basis of marital communications privilege; right, 8        Counsel? 9           MR. SYLVAN: Correct. 10          MS. WITTENBERG: And do you know the 11      answer to the question that I asked, Mr. Randall? 12          MR. DOAN: Do you know the answer without 13      revealing the communication? 14          MS. WITTENBERG: Correct. 15          MR. DOAN: So listen to her question 16      again. 17 Q. The question, I'll just make this a little simpler 18      for our court reporter having to repeat it back. 19      I'm asking you about conversations you had with 20      Stacy Randall about her signature stamp, and the 21      instruction is to not answer anything that would 22      reveal a communication while you were married and 23      living together. Is there a conversation that you 24      can think of, that you recall that would come in 25      that category of a conversation while you were</p>

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<p>1 married on this topic?</p> <p>2 A. Yes.</p> <p>3 Q. Okay. And if you hadn't been instructed not to</p> <p>4 answer, you would have given me information about</p> <p>5 that conversation?</p> <p>6 MR. DOAN: I'm just going to object to</p> <p>7 the extent it calls for a legal conclusion. He</p> <p>8 has to answer if there's no privilege.</p> <p>9 Q. Would you have answered if not for the instruction</p> <p>10 by counsel to not give that answer?</p> <p>11 A. I probably would have, yeah.</p> <p>12 THE COURT REPORTER: Wouldn't or would?</p> <p>13 THE WITNESS: Would.</p> <p>14 THE COURT REPORTER: Thank you.</p> <p>15 Q. Did anyone else overhear the conversation you're</p> <p>16 thinking of?</p> <p>17 A. Don't remember.</p> <p>18 Q. And did the two of you intend for the conversation</p> <p>19 to remain confidential?</p> <p>20 A. Yes.</p> <p>21 MR. SYLVAN: I'm going to, I'm going to</p> <p>22 instruct you --</p> <p>23 Q. I don't want to know what it is, I just want to</p> <p>24 know enough to know if it's privileged or not.</p> <p>25 Did Stacy ever tell anyone, as far as you</p>	<p>1 A. I don't think so. I really don't remember.</p> <p>2 Q. You're aware that Stacy used to work for Widen</p> <p>3 Enterprises; right?</p> <p>4 A. Yes.</p> <p>5 Q. Is there any other job that you know of that Stacy</p> <p>6 has held for any employer, other than Widen</p> <p>7 Enterprises?</p> <p>8 A. Yes.</p> <p>9 Q. Okay. On what occasions?</p> <p>10 A. She worked at, in retail.</p> <p>11 Q. Do you recall approximately when that was?</p> <p>12 A. Well, it was when the kids were growing up. She</p> <p>13 worked at a -- because she could buy them nice</p> <p>14 clothes and stuff like that.</p> <p>15 Q. Was it before you moved to Florida?</p> <p>16 A. Yes.</p> <p>17 Q. Okay. That was about in year 2000; is that right?</p> <p>18 A. Would have been before that, I think.</p> <p>19 Q. When you moved to Florida, was it around the year</p> <p>20 2000?</p> <p>21 MR. SYLVAN: I'm going to object.</p> <p>22 Q. Or, I'm sorry, before?</p> <p>23 A. Yes.</p> <p>24 Q. Just for a clear record, so you recall that Stacy</p> <p>25 has had employment outside of Widen Enterprises,</p>
Page 237	Page 239
<p>1 know, the contents of that conversation?</p> <p>2 MR. SYLVAN: Objection. Calls for</p> <p>3 speculation.</p> <p>4 A. Yeah, I don't know.</p> <p>5 MR. SYLVAN: And I'm going to caution you</p> <p>6 not to reveal communications you had with Stacy</p> <p>7 during your marriage in private.</p> <p>8 Q. Did you ever hear Stacy talk with anyone else</p> <p>9 about her signature stamp?</p> <p>10 MR. SYLVAN: Object to form.</p> <p>11 MR. DOAN: Join.</p> <p>12 A. I don't remember.</p> <p>13 Q. Did you ever see or hear Stacy give her approval</p> <p>14 to use a signature stamp?</p> <p>15 MR. DOAN: Objection. Compound.</p> <p>16 A. No.</p> <p>17 Q. Did you ever speak with Mike Kiesler about Stacy's</p> <p>18 signature stamp?</p> <p>19 MR. SYLVAN: Object to form.</p> <p>20 A. No.</p> <p>21 Q. Did you ever speak with Reed Widen about Stacy's</p> <p>22 signature stamp?</p> <p>23 MR. SYLVAN: Object to form.</p> <p>24 A. I don't remember.</p> <p>25 Q. Have you ever used Stacy's signature stamp?</p>	<p>1 and it was before moving to Florida; right?</p> <p>2 A. Yes.</p> <p>3 Q. Is there any time after the two of you moved to</p> <p>4 Florida that Stacy has had a job with anyone other</p> <p>5 than Widen Enterprises?</p> <p>6 A. I, no, I don't, no, no, I would say no.</p> <p>7 Q. Do you recall times when the two of you in the</p> <p>8 presence of Justin Randall, your son, would talk</p> <p>9 about or complain about not getting money from</p> <p>10 Windy Waters or Widen Enterprises?</p> <p>11 MR. SYLVAN: I'm going to caution you not</p> <p>12 to disclose communications you had with Stacy</p> <p>13 during your marriage in private.</p> <p>14 Q. And I'm only asking right now about the</p> <p>15 conversations you had with your son present</p> <p>16 complaining or talking about not receiving --</p> <p>17 A. I really don't remember.</p> <p>18 Q. -- money from Windy Waters or Widen Enterprises.</p> <p>19 A. I really don't.</p> <p>20 Q. Okay. Now, I'm not talking about the contents of</p> <p>21 any conversations, but were there times when you</p> <p>22 thought it unfair that Stacy was not receiving</p> <p>23 money from the companies?</p> <p>24 MR. SYLVAN: Objection. Form.</p> <p>25 MR. DOAN: Join.</p>

<p style="text-align: right;">Page 240</p> <p>1 A. Yeah, I think she should have been paid out money, 2 yeah. 3 Q. And are those things that you complained about in 4 the presence of anyone other than your wife alone? 5 MR. SYLVAN: I'm going to caution you not 6 to reveal communications you had with Stacy in 7 private during your marriage. 8 A. I don't remember. 9 Q. How would you describe Mark Widen's personality? 10 MR. SYLVAN: Objection. Form. 11 MR. DOAN: Join. 12 A. I, I, I don't know. I've never thought about his 13 personality. 14 Q. Well, if you can think about it now, how would you 15 describe his personality? 16 MR. DOAN: Same objection. 17 MR. SYLVAN: Join. 18 A. Strong willed. 19 Q. Were you afraid of him? 20 MR. SYLVAN: Objection. 21 MR. DOAN: Object to form. 22 MR. SYLVAN: Join. 23 A. I'm normally not afraid of anybody. 24 Q. And how would you describe Reed Widen's 25 personality?</p>	<p style="text-align: right;">Page 242</p> <p>1 MR. SYLVAN: I'm going to object to form 2 on that question as well. 3 Q. Does Stacy have memory problems? 4 MR. SYLVAN: Objection. 5 MR. DOAN: Object to form. 6 MR. SYLVAN: Calls for speculation and 7 expert opinion. 8 MR. DOAN: I'll join that. 9 A. I don't think so. 10 Q. Now, thinking back before you and Stacy were 11 married, I assume there was a time that the two of 12 you were dating but not married? 13 A. (Witness indicating). 14 Q. Is that a yes? 15 A. Yes. 16 Q. Okay. Did you have discussions with Stacy before 17 the two of you were married about the family 18 business? 19 A. I would say no. 20 Q. Before the two of you got married, did you know 21 that her family owned a business? 22 MR. SYLVAN: Object to form and calls for 23 a legal conclusion. 24 A. I really don't remember what I was thinking at the 25 time.</p>
<p style="text-align: right;">Page 241</p> <p>1 MR. DOAN: Same objection. 2 MR. SYLVAN: Join. 3 A. I don't know how I'd describe it. 4 Q. How would you describe Mike Kiesler's personality? 5 MR. DOAN: Same objection. 6 MR. SYLVAN: Join. 7 A. I, I really don't know how to describe his 8 personality. 9 Q. Let's go back to Reed. Are you, are you afraid of 10 Reed Widen? 11 MR. DOAN: Object to form. 12 MR. SYLVAN: Join. 13 MR. DOAN: Also asked and answered. 14 I think he said he's not afraid of anybody. 15 A. Right. 16 Q. Okay. So you're not afraid of Reed Widen then; 17 right? 18 A. I'm not afraid of anybody. 19 Q. Are you afraid of Mike Kiesler? 20 A. I'm not -- 21 MR. DOAN: Same objection. 22 MR. SYLVAN: Asked and answered. 23 A. I'm not afraid of anybody. 24 Q. Do you know Matthew Gonnering? 25 A. No.</p>	<p style="text-align: right;">Page 243</p> <p>1 Q. Okay. 2 A. Whether they did or not, I don't know. 3 Q. Did you ask Mark Widen for permission to marry his 4 daughter? 5 A. I did. 6 Q. Did that conversation include any discussion about 7 the family business? 8 A. Did not. 9 Q. I assume he said yes? 10 A. He was pretending he was having a heart attack. I 11 thought he was going to hit me, but he just was 12 padding his chest. 13 Q. And there were times that you attended Sunday 14 dinners at the Widen family; is that right? 15 A. Yes. 16 Q. Do I understand right that those were routine 17 occurrences? 18 A. Yes. 19 Q. And it was expected that the family would all 20 attend? 21 A. Yes. 22 Q. Do you recall when you started going; was it 23 before you were married? 24 A. I don't remember. 25 Q. How would you describe --</p>

<p style="text-align: right;">Page 244</p> <p>1 A. Yes, yes, I do remember because I remember they 2 made me wash dishes. 3 Q. So this was before, before the two of you were 4 married -- 5 A. Before we were married. 6 Q. -- your job was to wash dishes? 7 A. We were engaged. 8 Q. Okay. 9 A. They were just playing with me, but -- 10 Q. All right. How would you describe these dinners? 11 MR. DOAN: Object to form. 12 MR. SYLVAN: Join. 13 A. I, I don't know. I can't describe them. 14 Q. Were they pleasant? 15 MR. DOAN: Object to form. 16 MR. SYLVAN: Join. 17 A. Sometimes. 18 Q. Were, was business discussed during these 19 dinners? 20 MR. DOAN: Object to form. 21 MR. SYLVAN: Join. 22 A. I don't remember. 23 Q. Okay. Besides just generally, do you remember 24 there being times business was discussed, or are 25 you saying you don't remember that ever</p>	<p style="text-align: right;">Page 246</p> <p>1 A. Yeah, I don't know. 2 Q. Okay. I'm trying to imagine a scenario where that 3 would make sense in context. Was, was, do you 4 recall anything that was said right before Mark 5 Widen pounded the table? 6 A. You're talking so many years ago, I don't really 7 remember. 8 Q. Okay. Do you recall anything else about an 9 occasion when Mark Widen pounded the table other 10 than the fact that it occurred? 11 MR. SYLVAN: I'm going to object to form. 12 A. I just don't remember, it's too long ago. 13 Q. Okay. Do you recall ever being asked to sign a 14 document other than the ones we talked about at a 15 Sunday dinner? 16 MR. DOAN: Object to form. 17 MR. SYLVAN: Join. 18 A. Document, what? 19 Q. Were you ever asked to sign documents as a part of 20 a Sunday dinner? 21 MR. DOAN: Same objection. 22 A. I don't -- 23 MR. SYLVAN: Join. 24 A. I don't remember, but somehow I signed some of 25 these.</p>
<p style="text-align: right;">Page 245</p> <p>1 happening? 2 MR. DOAN: Object to form. 3 A. I just don't remember, but I'm sure it, it could 4 have, but I don't remember. 5 Q. Do you remember any occasion when Mark Widen 6 pounded the table? 7 MR. DOAN: Object to form. It calls for 8 speculation. 9 A. More than once. 10 Q. Can you tell me what, if you recall, what caused 11 Mark Widen to pound the table? 12 MR. DOAN: I'm going to object to form to 13 the extent that I think his answer is more than 14 once so I don't know -- 15 Q. Sure. On any occasion, do you recall what 16 caused -- 17 A. Don't remember. 18 Q. What was your reaction when that happened? 19 A. I didn't need to be there at that time, so I 20 probably got up and went in the other room. 21 Q. And the pounding the table, was that out of 22 anger? 23 MR. DOAN: Object to form. 24 MR. SYLVAN: Join. Calls for 25 speculation.</p>	<p style="text-align: right;">Page 247</p> <p>1 Q. Okay. 2 A. Where that was, I don't know but maybe on Sunday 3 dinners. 4 Q. Now, talk a little bit about the employment period 5 when I believe there was a time where both you and 6 Stacy were employed by Widen Enterprises; is that 7 right? 8 A. That is correct. 9 Q. And that's the time leading up to when you moved 10 to Florida; right? 11 MR. SYLVAN: Object to form. 12 A. I'm sorry, what? 13 Q. And that's the time leading up to when you moved 14 Florida; right? 15 MR. SYLVAN: Same objection. 16 A. When we moved to Florida, I was no longer working 17 for Widen. 18 Q. When you moved to Florida, Stacy was no longer 19 working for Widen as well, or did she continue 20 working after you moved? 21 A. I don't, don't remember. 22 Q. When your employment ended, I believe you said it 23 was due to disability? 24 A. (Witness indicating). 25 Q. I'm sorry. For the record, that was a yes?</p>

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<p>1 A. Yes. 2 Q. Do you recall the reason that Stacy's employment 3 ended with Widen Enterprises? 4 MR. SYLVAN: Objection. Calls for 5 speculation. 6 A. No, I don't remember. 7 Q. Were you present at the time when there was a 8 discussion with Stacy and Mark Widen or any other 9 Widen family member about the end of her 10 employment? 11 MR. DOAN: Object to form. 12 MR. SYLVAN: Join. 13 A. Don't remember. 14 MS. WITTENBERG: Let's take a quick 15 break. I'm getting near the end of my notes and I 16 can collect some thoughts. 17 (Exhibit identification <a href="#">19</a> marked for 18 identification) 19 Q. Mr. Randall, you have in front of you a document 20 that's marked Exhibit <a href="#">19</a>. I'll ask you to turn to 21 the signature page, which is, well, the signature 22 page is three from the end, WINDY0008442. Do you 23 see a date on that page of November 11, 2015? 24 A. Yes. 25 Q. Okay. And do you see a signature on the line for</p>	<p>1 Mr. Randall. We're done with that document now. 2 I think I asked you whether or not there 3 were any conversations after the one following 4 mediation about the transaction between Stacy and 5 Windy Waters. We've covered that ground. I'm 6 asking a different question now. I want to know 7 any time after the mediation and your divorce if 8 you've had any discussions with Stacy about Windy 9 Waters generally. 10 MR. SYLVAN: Object to form. 11 A. No. 12 Q. And in that same time period, have you had any 13 discussions with Stacy about Reed Widen? 14 A. I'm not sure. 15 Q. Have you had any discussions, again when in that 16 same time frame, since the mediation and your 17 divorce, with Stacy about Mike Kiesler? 18 A. After the mediation? 19 Q. Right. 20 A. Yes. 21 Q. Okay. What can you tell me about that 22 conversation? 23 A. I, I really don't remember the conversation, but I 24 believe it was about selling her stock completely 25 out.</p>
<p>1 Steven T. Randall? 2 A. Yes. 3 Q. Is that your signature? 4 A. Yes. 5 Q. Do you see a signature line for Stacy L. 6 Randall? 7 A. Yes. 8 Q. Is that her signatures? 9 A. I, I don't know. I think so. 10 Q. It looks like the two of you were before a notary 11 when this was signed; is that right? 12 A. It appears that way. 13 Q. Do you have any recollection of signing this 14 document? 15 A. Yeah, I remember it. 16 Q. What did this document relate to? 17 MR. SYLVAN: Object to form. 18 A. I believe it's a Land Contract like it says on the 19 front. 20 Q. Is it related to one of the properties that was 21 owned by you or Stacy or both of you? 22 A. Both of us. 23 Q. And to make sure I've asked the right questions, I 24 wanted to ask a follow-up. I know I asked a few 25 times whether or not -- You can put that away,</p>	<p>1 Q. And is that -- 2 A. And that included that we talked about Reed and 3 Michael Kiesler and Gonnering she talked to. I 4 really don't remember. 5 Q. Are you thinking of the conversation that we 6 talked about earlier, it was shortly after 7 mediation, or is this a different time that you 8 talked with her about these topics? 9 MR. SYLVAN: Object to form. 10 A. Probably the same time. I don't know. 11 Q. Okay. And, again, it's a different question, just 12 to make sure that we've asked the right ones, is 13 there any time since the mediation and your 14 divorce that you've had a discussion with Stacy 15 Randall except that conversation about the buyout 16 that we've already talked about that you talked 17 about Widen Enterprises with Stacy? 18 MR. SYLVAN: Object to form. 19 A. I, I don't know. 20 MS. WITTENBERG: All right. Nothing else 21 from me at this time. 22 Do you have some questions, Counsel? 23 MR. SYLVAN: We don't want to keep you 24 longer, so we're, we're fine. No questions from 25 us.</p>

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1 MS. WITTENBERG: Oh, okay.  
2 MR. SYLVAN: Yes.  
3 MS. WITTENBERG: Okay. Nothing else.  
4 Then we're all done.  
5 (Proceedings concluded at 1:24 p.m.)  
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1 STATE OF WISCONSIN)  
2 MILWAUKEE COUNTY )  
3 I, JANET D. LARSEN, a Notary Public in  
4 and for the State of Wisconsin, do hereby certify that  
5 the deposition of STEVEN RANDALL was taken before me  
6 under and pursuant to the Federal Rules of Civil  
7 Procedure on the 6th day of November, 2023.  
8 That before said witness testified,  
9 he was first duly sworn by me to testify the truth.  
10 That I am not a relative or employee or  
11 attorney or counsel of any of the parties, or a  
12 relative or employee of such attorney or counsel, or  
13 financially interested directly or indirectly in this  
14 action.  
15 That the foregoing pages are a true and  
16 correct transcription of my original shorthand notes  
17 taken at said time and place.

18 Dated this 7th day of November, 2023  
at Milwaukee, Wisconsin.  
19

  
—  
20 JANET DONALDSON LARSEN  
21 REGISTERED PROFESSIONAL REPORTER  
NOTARY PUBLIC, STATE OF WISCONSIN  
22 MY COMMISSION EXPIRES 1-22-26  
23  
24  
25

Janet Donaldson Larsen  
NOTARY PUBLIC  
STATE OF WISCONSIN

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